

- RECORD #1441 DETAIL

First Name : Ross
Last Name : Capon
Business Name : Nat'l Assoc of RR Passengers
Address : 9220 Shelton St
City : Bethesda
State : MD
Zip Code : 20817
Email Address :

Submission Content/Notes : Ross, R-O-S-S, Capon, C-A-P-O-N. Testifying for myself and my family, Bethesda residents and also as president of National Association of Railroad Passengers. I'm stubborn but not well financed.

When Harry Sanders and I formed the Action Committee for Transit, I had no idea that 22 years later there would still be a question about whether to convert the former freight railroad into light rail and that I would be telling you today that my oldest son, a Maryland senior and daily commuter, has spent a good part of the last four years on the beltway.

I hope my 8-year old, should he attend Maryland, will have better public transportation. That, too, is quality of life. We are pleased that the University has agreed to the right-of-way that the student government pressed for and which will ensure maximum usefulness of the service for the University community.

Rail attracts riders by virtue of greater comfort, generally more on-board space per passenger and a smoother ride and better system identity. Rail is also safer, particularly in bad weather, than buses and more reliable. To people in the Columbia County Club who have worked hard against light rail I recommend a visit to Newton, Massachusetts, where I grew up on the wrong side of the tracks.

However, on the city south side is the Highland Branch, which in the late 1950's was transformed from low frequency diesel railroad to light rail, the Riverside Branch of Maryland's, of MBTA's Green Line. This service is highly successful, boosts property values and bisects the historic Woodland Golf Club founded in 1896.

It is a sad commentary on Maryland priorities that we are still debating whether to build the Purple Line, even as MTA holds hearings on cutting MARC train and transit services and we see continuing cuts on ride on bus service but construction on the inner county connector moves happily along. I've asked Maryland DOT and not received an answer about how the budget cuts were allocated among the mobile administrations and whether the same percentage cuts were applied to the highway administration and the MTA, even though the former is huge and the latter is small and more environmentally beneficial.

Bottom line, here we thank the MTA for however belatedly advancing the Purple Line light rail and we hope to live to see it built. Thank you.

- RECORD #2232 DETAIL

First Name : Ross B.
Last Name : Capon
Business Name : National Association of Railroad Passengers
Address : 9220 Shelton Street
City : Bethesda
State : MD
Zip Code : 20817-2410
Email Address : reapon@narprail.org
Submission Content/Notes :
Attachments : Wrtn Tstmny. R.B.Capon.pdf (2 mb)

Support for Purple Line Light Rail Transit

**Statement of National Association of Railroad Passengers
And Ross Capon, NARP President and a Bethesda resident**

Before the

Purple Line Alternatives Analysis/Draft EIS Public Hearing

Chevy Chase, Maryland

November 18, 2008

Thank you for this opportunity to speak.

As a co-founder with Harry Sanders of the Action Committee for Transit back in 1986, I had no idea that, 22 years later, there would still be a question about whether to build light rail on the former B&O freight line—and that I would be telling you at this hearing that my oldest son, a Maryland senior and daily commuter, has spent a good part of the last four years on the Beltway. I hope my eight-year-old, should he attend Maryland, will have better public transportation.

The Purple Line will bring important travel-choice and environmental benefits. We urge that it be built as rapidly as possible.

The Purple Line will enhance the usefulness—and extend the reach of—Metrorail due to connections at Bethesda, Silver Spring, College Park and New Carrollton.

We are pleased that the University of Maryland administration has agreed to the right-of-way that the student government pressed for and which will insure maximum usefulness of the service for the university community.

Bus Rapid Transit, as it has called, is not the right answer. A GAO study found light rail 15.5% less costly to operate than bus. Vehicle life-cycle costs favor rail. Federal Transit Administration will assist in bus replacements at 12 years, rail vehicles at 25 years (and rail vehicles can operate for 30-35 years).

Rail attracts riders by virtue of greater comfort—that is, generally more on-board space per passenger and a smoother ride—and better system identity. Rail also is safer, particularly in bad weather, and more reliable. In a February, 2006, storm, New Jersey Transit shut down its entire bus system but not the light rail lines in Newark and Jersey City. Boston had to remove articulated buses from its Silver Line because they fishtailed dangerously in the snow.

(over)

Our impression is that Bus Rapid Transit, for the most part, is supported by people who really don't want anything at all, or whose main goal is to keep transit of any kind off the Georgetown Branch right-of-way in Bethesda, placing it instead on Jones Bridge Road where it will inevitably serve lower passenger volumes.

To people (and the Columbia Country Club) who have worked hard against light rail, I recommend a visit to Newton, Massachusetts. I grew up there, on the "wrong side of the tracks" (the former Boston & Albany mainline, now MBTA commuter rail and the Mass Turnpike Extension). However, on the city's south side, there is the Highland Branch which, in the late 1950s was transformed from a low-frequency diesel railroad to light rail (Riverside branch of MBTA's Green Line). This service is highly successful and an asset to property values. The line bisects the historic Woodland Gulf Club, founded in 1896.

It is a sad commentary on transportation priorities in Maryland that, even today, we are asking whether to build the Purple Line, and holding hearings on cutting MARC train and MTA transit services, and seeing continuing cuts on Ride-On bus service, but construction on the InterCounty Connector moves along. I have asked Maryland DOT, and not received an answer, about how the budget cuts were allocated among the modal administrations, and whether the same percentage cuts were applied to the Highway Administration and the MTA, even though the former is huge and the latter is smaller and more environmentally beneficial.

Thank you for considering our views.

Ross B. Capon
9220 Shelton St.
Bethesda, MD 20817-2410

National Association of Railroad Passengers
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Web: www.narprail.org
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- RECORD #1171 DETAIL

First Name : Jan
Last Name : Townsend
Business Name : Neighborhood Design Center
Address : 4102 Webster Street
City : N. Brentwood
State : MD
Zip Code : 20742
Email Address :

Submission Content/Notes : My name is Jan Townsend. I'm Program Manager at the Neighborhood Design Center in Prince George's County.

I have been involved in a year-long planning project for the Kenilworth Avenue corridor and I'm anxious to give my views about the type of route that we will have through the Kenilworth area.

I would like to make sure that the route goes directly down Kenilworth Avenue, which I think would be advantageous for the revitalization that we're trying to achieve in the area, and I'm very much pro the idea of an elevated route through that section.

The intersection of Kenilworth Avenue and East/West Highway is already a mess and at peak times the intersection becomes very (inaudible) I don't think it would be practical to have a train coming through in the mix and have light changes involved in that.

The elevated idea is a much, much better idea. It also would allow us to have a station in the Riverdale Road area which would be elevated and allow transit to come in underneath as we see at the Silver Spring Metro station now.

That is the extent of my testimony. I should further point out that Riverdale Plaza is going to be revitalized and having this elevated station would very much tie in with what we're trying to achieve in planning for the revitalization of Riverdale Park. Thank you.

- RECORD #1117 DETAIL

First Name : Pastor Dawn
Last Name : Burrell
Business Name : New Creation Christian Church & Ministries
Address : 7726 Finns Lane
City : Lanham
State : MD
Zip Code : 20706
Email Address :

Submission Content/Notes : "Good morning. It's Dawn, D-A-W-N, last name is Burrell, B-U-R-R-E-L-L. I'm the Senior Pastor of New Creations Christian Church and Ministries. Located in Lanham but actually two blocks up from the New Carrollton Metro Station.

I received information about this hearing not through a mailing, or not through a phone call, but through DeMarche who has already spoken. So I support the comments that he presented to you today. That the Purple Line now is an excellent project for this community.

I speak on behalf of my church as a place of worship where we impact New Carrollton, Lanham and Riverdale area with outreach community services and I believe that this area has been forgotten by many in Prince George's County.

So I believe that the Purple Line will help with economic development. It will assist the low and moderate-income families who are seeking to provide for their families as well as be there for them. So I'm in support."

- RECORD #1476 DETAIL

First Name : Richard
Last Name : Zorn
Business Name : North Chevy Chase Citizens Assoc.
Address : 3508 Glenmoor Drive
City : Chevy Chase
State : MD
Zip Code : 20815
Email Address :

Submission Content/Notes : My name is Richard Zorn. First name is spelled R-I-C-H-A-R-D, last name is spelled Z, the last letter of the alphabet, O-R-N. My address is 3508 Glenmoor Drive, Chevy Chase, Maryland, zip 20815. I'm also a member of a small organization, the North Chevy Chase Citizens Association and one of our primary interests has been this Purple Line but we've had some other local interests also.

I've been following this Purple Line on behalf of the North Chevy Chase Citizens Association for about two years now. We very strongly favor putting in the Purple Line and we strongly favor putting it in with a system that gives us the fastest connections between Bethesda, Chevy Chase, Silver Spring and New Carrollton. So, we would like to see the light rail line, or if failing with, if that's not possible, we'd like to see one of the faster bus rapid transit options than the slower ones and we don't think the one that passes Jones Bridge Road is going to be very fast because of the traffic qualities there and the narrowness of that road.

So we think that probably the best option is the Capitol Crescent Trail and the extension of that trail on the Prince George's County end of the line.

In my own personal case, I commute three or four days a week from my home in Chevy Chase to College Park where I work at the National Archives. And I use an automobile to do this every day but if you put that line in there before I retire for a second time, I've already retired once and then I'm doing this other job now, I will certainly personally make use of it, almost daily basis. Three or four times a week. So, and I, and we have discussed it in the North Chevy Chase Citizens Association and a number of us use it and most of us favor it very strongly.

- RECORD #2538 DETAIL

First Name : Eden
Last Name : Durbin
Business Name : President, North Chevy Chase PTA
Address :
City :
State : MD
Zip Code :
Email Address : TQSJ@MAC.COM

Submission Content/Notes : January 9, 2009

To: U.S. Department of Transportation, Federal Transit Administration

Diane Ratcliff, MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Phil Andrews, President
Montgomery County Council

From: North Chevy Chase Elementary School PTA

North Chevy Chase Elementary School

Our school is located on the south side of Jones Bridge Road east of Connecticut Avenue and just south of I-495. We are currently a neighborhood of small and moderately-sized homes. We are a tight-knit community that is moving toward less car use and more walking and biking. Our children walk and ride bikes on the current Capital Crescent Trail and on the sidewalks on both sides of Manor Road and Jones Bridge Road.

Our most serious concern about the Purple Line DEIS is that the BRAC process, moving Walter Read Army Hospital to Bethesda Naval Hospital, has not been addressed. Both of these projects will impact the traffic on Jones Bridge Road and Connecticut Avenue.

NCC School Community—Issues of Concern

Traffic Impact

The Base Realignment and Closure (BRAC) process is estimated to bring an additional 2,500 staff and 1,862 patients and visitors to the hospital every day, according to the Navy's FEIS. This would add cars and vehicles to Jones Bridge Road at the very time children commute to school in the morning and evening rush hours. The intersection of Connecticut Avenue and Jones Bridge Road, where North Chevy Chase Elementary School is located, is already one of the busiest intersections in the state of Maryland. The DEIS proposes the option of a rail station one block south of this intersection. We envision a traffic nightmare that will compromise the safety of the pedestrians and bicycle riders and slow down vehicular commuters.

Loss of parking and sidewalks

With the low-investment BRT alternative, the DEIS reports that the traffic and pedestrian situation would be similar to what it currently is. This is not an accurate analysis of the proposal; losing sidewalks on Jones Bridge Road would greatly decrease pedestrian safety and dissolve the character of our pedestrian-based community.

Development Issues at Rail Stops

Light rail stop at Manor Rd/Connecticut Ave.:

Traffic: It is likely that rail stop at this location would set in motion a significant mixed-use development. Traffic would grind to a standstill if a comprehensive traffic plan is not in place. Once again, the BRAC traffic needs to be considered. If a light rail stop is located at Connecticut Avenue and Manor Road, it should help mitigate the BRAC traffic. We

support mass transit, getting people out of their cars and onto bikes, walking, or getting on the train.

We have many ideas about solutions and would welcome further discussion.

Respectfully Submitted,

Eden Durbin, President
North Chevy Chase PTA

Attachments :

North Chevy Chase PTA.pdf (9 kb)

January 9, 2009

To: U.S. Department of Transportation, Federal Transit Administration

Diane Ratcliff, MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Phil Andrews, President
Montgomery County Council

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We have many ideas about solutions and would welcome further discussion.

Respectfully Submitted,

Eden Durbin, President
North Chevy Chase PTA

- RECORD #80 DETAIL

First Name :	Howard
Last Name :	Kaplan
Business Name :	North Chevy Chase Transportation Committee
Address :	P. O. Box 343
City :	Kensington
State :	MD
Zip Code :	20895
Email Address :	hkaplan@capaccess.org
Submission Content/Notes :	The focus group meeting minutes, the latest of which is Feb., 2007, contain many questions and concerns. Have these been answered and, are any more meetings scheduled?

- RECORD #1224 DETAIL

First Name :	Woody
Last Name :	Brosnan
Business Name :	North Woodside, Montgomery Hills Civic Association
Address :	9101 Louis Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Woody, W-O-O-D-Y, Brosnan, B-R-O-S-N-A-N. I'm President of the North Woods Side Montgomery Hills Citizens Association representing about 350 homes bordering the proposed purple line light rail route between Brookville Road and 16th Street.

We are in District 18 by Chevy Chase. In a recent survey, our neighborhood voted by better than 3:1 margin to support the light rail option with protections for the neighborhood.

We believe if done right that the purple line would persuade people to use transit instead of cars to get to work, relieving some of the traffic that clogs our streets every morning and evening.

The purple line follows the county master plan that would bring two stations at 16th Street and Brookville Road within walking distance of our residents. This would make traveling to other Maryland suburbs much more convenient by transit.

The bus rapid transit option does nothing for my neighborhood. We have enough buses already.

The purple line also would all completion of the Capital Crescent Trail for a safer walk or bicycle ride to the Silver Spring Metro Station for our residents.

Now the trail effectively ends at the one lane Talbot Avenue Bridge over the CSX Railroad. Trail users are directed to go to Second Avenue and cross six lanes of 16th Street.

The purple line plan calls for a new pedestrian bike bridge next to the Talbot Bridge and a crossing free path along the CSX tracks directly into the Silver Spring Metro Station.

More transit choices also mean more stable property values in uncertain times.

Some of our residents do have concerns that can be addressed if the State of Maryland commits itself to the high level of service that Montgomery County residents expect. That means home inspections to ensure no damage from construction, erection of noise barriers and landscaping where appropriate, parking restrictions to ensure our streets are not used as commuter lots and fencing around the proposed rail yard at Lyttonsville and Brookville Road.

Let me address the opposition. You may have noticed a letter to the Washington Post today by a resident of Chevy Chase that complained about sharing the trail with light rail.

He said, and I quote, "where will all the families with their strollers go?" Well, families in our neighborhood walk their strollers on sidewalks without any problem.

I don't think the county taxpayers intended to spend \$10 million to buy right-of- way just so a couple thousand of our wealthier residents could enjoy their own tree lined baby walk.

Let me put on my hat as a retired journalist who has covered politics for 30 years. A few weeks ago the country voted for change and they put the Democrats in charge.

You know the percentages here locally. During the campaign, President Elect Obama was asked by the Observer about the light rail system in

that city. He replied, "You know if we are designing cities and urban communities and suburban communities around 2-hour commutes, then we are destined to continue down the course of climate change. Mass transit is not only more environmentally sound, but with oil prices sky high and not likely to go down significantly because of increased demand by China and India, it gives individuals much more incentive to look at trains and mass transit as an alternative."

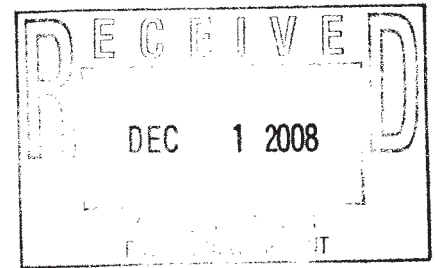
We are within the gaze of the capital and the national press. This is a challenge for the Democratic party in Maryland. Will the governor and other elected Democratic officials follow the lead of the new President, will they side with the working person stuck in traffic jams in the neighborhoods besieged by commuter traffic? Or will they side with the limousine liberals who want change everywhere except in their own backyard? Thank you.

- RECORD #513 DETAIL

First Name :	Jean
Last Name :	Heide
Business Name :	Northmont Citizens Association
Address :	9702 Saxony Road
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	
Submission Content/Notes :	
Attachments :	Forest Grove CA . Northmont CA.pdf (56 kb)

November 26, 2008

Michael Madden, Project Manager
Maryland Transit Administration
6 St. Paul Street, Baltimore, MD 21202



Dear Mr. Madden,

Our community associations, Forest Grove Citizens Association and Northmont Citizens Association, strongly endorse the light rail option for the proposed Purple Line bi-county mass transit connection. The light rail option would involve more initial cost than the various bus line proposals, but would also provide more flexible long-term growth potential, be more environmentally friendly, undoubtedly attract more riders, and lessen the growing user pressure on the existing North-South branches of the Metro Red Line. Although it is not being proposed as part of the Metrorail system as such, the light rail Purple Line option would most effectively serve as an extension of the overall Metrorail System in Maryland, provided that special interests do not manage to deflect the route to the Jones Bridge proposed alternative option based on bus transit.

The proposals employing various bus options all have more downside, both initially and in the long term. Constructing a dedicated "express" bus lane will be nearly as disruptive to nearby properties as any light rail construction, particularly if construction involves widening the right of way along the existing roadways to accommodate the new lane, rather than replacing an existing traffic lane. Any replacement of existing traffic lanes will have an immediate and unacceptable impact on the already congested east-west routes, and the growing traffic pressure will lead to constant commuter agitation to eliminate such bus lanes. Bus traffic, particularly if not in dedicated traffic lanes, will inevitably be subject to the same delays from congestion, traffic lights and accidents as existing bus and automobile traffic. Even dedicated lane express buses will have delays due to traffic at intersections, unless costly underpasses are constructed. Therefore, the term "express" with "bus" will be a certain oxymoron or misnomer.

Given the extensive construction of new concentrated residential and commercial development that the Maryland Counties are now committed to in the impacted areas, Maryland and the two Counties have no real option but to provide an effective East-West light rail mass transit connection. We can not allow the small but well funded groups of special interests in Chevy Chase and their spokespersons to stop or otherwise deflect this light rail option and its logical routing, nor can we be deterred by the "too costly" arguments put forward by some.

Sincerely,

Margot Cook

Margot Cook, President
Forest Grove Citizens Association
1603 Myrtle Rd, Silver Spring, MD 20902

Jean Heide

Jean Heide, Vice President
Northmont Citizens Association
9702 Saxony Rd, Silver Spring, MD 20910

- RECORD #45 DETAIL

First Name :	John
Last Name :	Walters
Business Name :	Oakview Citizens Association
Address :	9901 Dilston Road
City :	Silver Spring
State :	MD
Zip Code :	20903
Email Address :	jwalters@adv-power.com
Submission Content/Notes :	Do you have someone that provides a 15-20 minute presentation on the Purple Line to Civic Association? Feb. 27, 2008 8 PM

- RECORD #2332 DETAIL

First Name : Alice D.
Last Name : McNeil
Business Name : Old Ardwick-Ardmore Citizens Association
Address : 7720 Old Ardwick-Ardmore Road
City : Landover Hills
State : MD
Zip Code : 20784-2363
Email Address :
Submission Content/Notes :
Attachments : McNeil_Alice.pdf (136 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Alice D. McNeil Organization: Old Ardwick - Ardmore Citizens Association
Address: 7720 Old Ardwick - Ardmore Road
City: Landover Hills, State: MD Zip Code: 20784-2363

I/We wish to submit the following comments on this project: Our neighborhoods do not wish to inherit additional stress from the impact that the proposed Purple Line's "Light Rail"/Bus Transit would deliver to us. Those of us who live in the Old Ardwick - Ardmore Road and the Hanson Oaks neighborhoods have too much noise/air pollution, vibrations and other environmental factors as a result of the impact from AMTRAK, MARK TRAIN, METRO TRAINS/BUSES and ROUTE 50 TRAFFIC. Therefore, we are requesting that of the two New Carrollton Alternatives, please use the "Hickins Road" Alternative. It is unfair to subject any neighborhood to the additional stress that the Purple Line's "Ellin Road" alternative would impact us.

We invite those who will be choosing the New Carrollton Alternative to come spend a couple nights in our home to help those in charge to understand our plight.

Allow us to enjoy our homes. Please don't add unnecessary impact to our lives. We need "Peace" too. Thanks,

Alice D. McNeil, Old Ardwick - Ardmore Road
Citizens Association
President

- RECORD #1801 DETAIL

First Name : Stuart
Last Name : Moore
Business Name : Old Blair Auditorium Project
Address : 8639 B 16th Street
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : info@oldblairauditorium.org

Submission Content/Notes : I am pleased to submit comments regarding the proposed Purple Line transit project to the Maryland Transit Authority on behalf of the Board of Directors of the Old Blair Auditorium Project, Inc.

The Old Blair Auditorium Project, Inc. is a charitable non-profit organization formed by the community to help re-open the auditorium located in the old Montgomery Blair High School building at the corner of Wayne Avenue and Dale Drive as a mixed-use facility for the performing arts, in-school and after school programs, and community use.

As you may know, the Montgomery County Public School system, working with the County Government, the County Council, and non-profit organizations, will complete a facilities planning study this fiscal year to develop a Program of Requirements for the mixed-use facility.

The Purple Line has great potential to provide transportation for audiences attending events at the auditorium and for students, teachers, staff, and community members utilizing the after school and community use portions of the facility.

The Purple Line also has the potential to adversely impact the facility if street parking is fully eliminated along Wayne Avenue adjacent to the site. It is our understanding per the Maryland Transit Administration's Alternative Analysis/Draft Environmental Impact Statement (AA/DEIS) that the Low Investment and Medium Investment Alternatives will not require full removal of street parking along Wayne Avenue, which is currently used during certain after-school events at the Silver Spring International Middle School and Sligo Creek Elementary School and we expect will also be used during auditorium and community events at the renovated facility.

If the Low or Medium Investment option and a Wayne Avenue alignment is selected, we believe that a Dale Drive station that retains as much street parking as possible would provide great benefit to our community.

We respectfully request that the Planning Board consider future auditorium audience usage and after school and community usage of a station at Dale Drive in making a final recommendation.

Sincerely,

Stuart C. Moore
President
Old Blair Auditorium Project, Inc.

- RECORD #2558 DETAIL

First Name : Stuart C.
Last Name : Moore
Business Name : President, Old Blair Auditorium Project, Inc.
Address :
City :
State : MD
Zip Code :
Email Address : REILLYLC@STARPOWER.NET

Submission Content/Notes : I am pleased to submit comments regarding the proposed Purple Line transit project to the Maryland Transit Authority on behalf of the Board of Directors of the Old Blair Auditorium Project, Inc.

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We respectfully request that the Planning Board consider future auditorium audience usage and after school and community usage of a station at Dale Drive in making a final recommendation.

- RECORD #1240 DETAIL

First Name :	Alan
Last Name :	Bowser
Business Name :	Park Hills Civic Assoc
Address :	409 Deerfield Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Good afternoon. My name is Alan Bowser, A-L-A-N, B-O-W-S-E-R. I am the President of the Park Hills Civic Association, a neighborhood association for the East Silver Spring community bounded by Dale Drive and Sligo Creek Parkway and Piney Branch Road and Queen Brier Drive.

Perhaps more than any other residential community along the proposed route for the purple line, our Park Hills neighborhood may be the most affected and impacted by the MTA's proposed alternative routes in East Silver Spring, along Silver Spring and Thayer Avenues, Silver Spring south and the proposed Wayne Avenue alignment Silver Spring north.

To study the purple line's options and to study possible impacts in our community, our neighborhood established a Park Hills Civic Association purple line task force which has met many times over the last two years.

At our initiative, we have met with the MTA's project team several times, Montgomery County council members, members of our state delegation, the Montgomery County executive and attended all of MTA's open houses.

The Chair of our task force, Chris Richardson, was appointed to the Montgomery County National Capital Park and Planning Commission's functional master plan advisory group, and we've worked with the Silver Spring's Citizens Advisory Board and the President's Council of Downtown Silver Spring Civic Association's -

I'm personally very proud of the local process of community engagement that we put together in place in our neighborhood.

As a result of our community's deliberations, the Park Hills Civic Association has taken a number of formal decisions on the purple line issues.

In September, 2007 our Civic Association passed a resolution requesting that MTA assess the impact of an underground alignment on Wayne Avenue. We also asked for detailed studies of traffic.

The Maryland Transit Administration failed to act on either of these requests to our satisfaction. No traffic information was timely provided, no detailed tunneling alternatives for Wayne Avenue were included in the final DEIS.

In February, 2008 we took a vote. The results of that vote, 65 percent of the PHCA members supported a below grade option. Fifty-nine percent of PHCA members did not favor a transit station at the intersection of Wayne and Dale.

Just this past Thursday, the Civic Association again formally considered the purple line issues that affect Park Hills. This time we received the report of our purple line task force.

In our discussion before the formal vote, the association discussed general concerns about preserving the character of our neighborhood and general support for public transit.

While there is strong support for transit and specifically the purple line and light rail options among the Park Hills community and the Park Hills Civic Association, there is little support for an at-grade bus rapid transit or light rail transit option along the proposed Wayne Avenue alignment.

We take comfort that both Governor O'Malley and Montgomery County Executive Leggett have both expressed tunneling through established neighborhoods.

We request that the MTA again fully evaluate a below grade tunneling option for Wayne Avenue to assess cost effectiveness and the impact of travel times and ridership. Thank you.

- RECORD #2286 DETAIL

First Name :	Alan
Last Name :	Bowser
Business Name :	Park Hills Civic Association
Address :	
City :	Silver Spring
State :	MD
Zip Code :	
Email Address :	
Submission Content/Notes :	
Attachments :	Bowser_Alan.pdf (3 mb)

- RECORD #1529 DETAIL

First Name :	CHRISTOPHER G.
Last Name :	RICHARDSON
Business Name :	
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	MELCHRIS@EROLS.COM

Submission Content/Notes : WRITTEN COMMENTS ON PURPLE LINE AA/DEIS SUBMITTED BY CHRISTOPHER G. RICHARDSON

Diane Ratliff

Director of Planning

Maryland Transit Administration

I am submitting these written comments to be included in the complete record for the public's review of the Purple Line AA/DEIS. What follows is a somewhat longer version of the testimony I gave at the November 22 public hearing at Montgomery College in Takoma Park.

Maryland Transit Administration

Testimony of

Chris Richardson

Chair of the Park Hills Civic Association's Purple Line Task Force

Public Hearing on

Purple Line Draft Environmental Impact Statement/Alternatives Analysis

Montgomery College

Silver Spring

November 22, 2008

I am an officer with the Park Hills Civic Association, as well as the Chair of the Civic Association's Purple Line Task Force. For the last year I have also served on Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group. Therefore, through my positions with my civic association and the Advisory Group to the Planning Board, I am very familiar with the details of the Purple Line, my community's concerns, and what has been done or not done to address them.

In Park Hills, we have taken two votes, in February and this week, and both times the opposition to street-level light rail on Wayne has been an overwhelming majority. This week, only 31% of those voting favored

street-level light rail on Wayne. 67% favored one of several other options – no-build, TSM, bus rapid transit, or light rail tunneled under Wayne Avenue. Street-level rail on Wayne is simply not favored in my community.

One of MTA's stated benefits for the Purple Line project is to "complement the over \$400 million in renovations and new construction that are being invested in Silver Spring." HOWEVER, running a street-level train across Georgia Avenue downtown during peak travel period, creating a fifth stream of traffic at the increasingly-gridlocked intersection of Wayne & Fenton, and hampering traffic at the Whole Foods entrance, as well as the Wayne Avenue Parking Garage strikes me and much of my community as pure folly, since it threatens to undo the positive momentum caused by the success of the downtown Silver Spring development – and that success equals increased tax dollars.

MTA has planned extensive widening of Wayne Avenue for left turn lanes, a station at Dale Drive that much of the nearby community does not want. MTA's engineering drawings indicate that nearly two-thirds of the one mile on Wayne on which the surface route would run will be widened. That creates very substantial adverse impacts which are not acknowledged in the Draft Environmental Impact Statement. Many homes and institutions on Wayne will lose portions of their yards, whether they are within the right of way or not. And the widening will clearly increase the traffic capacity and traffic volume on Wayne. Ironically, the surface route of this mass transit system, will increase the number of cars on Wayne, in addition to tying up the business district in gridlock.

I might be more amenable to the Park Hills, Seven Oaks-Evanswood and East Silver Spring communities taking one on the chin as a result of a street-level train on Wayne Avenue and the degree to which the character of these residential neighborhoods would be permanently impacted if the Purple Line

(1) were rapid transit (it's only rapid between Bethesda to Silver Spring);

(2) took a significant number of cars off the road (it only takes a modest percentage);

(3) generated more than 20% new ridership and didn't poach riders from existing transit;

(4) didn't threaten to displace transit-dependent population, for whom the transit system is intended to serve, as a result of high rents stimulated by transit-oriented economic development, particularly in such communities as Long Branch and Langley Crossroads;

I believe that the majority of my community supports a wisely designed west-to-east mass transit but firmly believes that any Purple Line, in

either light rail or bus rapid transit form, must be tunneled under Wayne Avenue and downtown Silver Spring. That will improve the Purple Line for my community, those who use or travel through the downtown, all of Silver Spring, and the greater region. It is clear from recent data from MTA after the study documents were released that tunneling can be included as part of a hybrid alternative with the medium-investment route and tunneled in such a way under downtown as to be cost effective and improve ridership and travel times. My community would look forward to a serious effort in working with the State and County to make tunneling a reality for this segment of the Purple Line.

- RECORD #1269 DETAIL

First Name :	Chris
Last Name :	Richardson
Business Name :	Park Hills Civic Assoc
Address :	402 Deerfield Avenue
City :	
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Chris Richardson, C-H-R-I-S, Richardson R-I-C-H-A-R-D-S-O-N. I am an officer with the Park Hills Civic Association. I am also the Chair of our Civic Association's purple line task force, and for the last year I have also served on the Montgomery County Planning Board's purple line functional master plan advisory group.

Therefore, through my positions with my civic association and the advisory group to the planning board, I am very familiar with the details of the purple line, my community's concerns and what has been done or not been done to address them.

In Park Hills, we have taken two votes. In February of this year and just this past week. Both times the opposition street level light rail on Wayne has been an overwhelming majority.

This week, only 31 percent of those voting favored street level light rail on Wayne. Two-thirds favored one of several other options, either no build, TSM or build options that if and only if they are tunneled under Wayne Avenue.

Street level on Wayne is simply not favored in our community.

One of MTA's stated benefits for the purple line project is "to compliment the over \$400 million in renovations in new construction that are being invested in Silver Spring."

However, running a street level train across Georgia Avenue downtown during peak travel period creating a fifth stream of traffic at an increasingly gridlocked intersection of Fenton and Wayne and hampering traffic at the Whole Foods entrance as well as the Wayne Avenue parking garage.

It strikes me and much of our community as pure folly since it threatens to undo the positive momentum caused by the success of the downtown Silver Spring development, and that success equals increased tax dollars.

MTA has planned extensive widening of Wayne Avenue for left-turn lanes, a station at Dale Drive that much of the nearby community does not want.

MTA's engineering draws indicate that nearly 2/3 of the one mile on Wayne on which the surface route would run won't be widened. That creates a very substantial adverse impacts which are not acknowledged in the DEISAA.

Many homes and institutions on Wayne will lose portions of their yards whether they are within the right-of-way or not, and the widening will create, will clearly increase the traffic capacity and traffic volume on Wayne.

Ironically, the surface route of this mass transit system will increase the number of cars on Wayne in addition to tying up the business district in gridlock.

I might be more amenable to the Park Hills, Seven Oaks, Evanswood and East Silver Spring communities taking one on the chin as a result of a street level train on Wayne Avenue and the degree to which the character of these residential neighborhoods will be permanently impacted if the purple line were rapid transit. It's only rapid between Bethesda to Silver Spring.

If it took a significant number of cars off the road and it only takes a modest percentage, if it generated more than 20 percent new ridership and didn't poach as many riders from the existing transit system and didn't threaten to displace transit dependent populations for whom this system is intended to serve.

So I believe the majority of my companions support a wisely designed east to west mass transit but believes that any purple line must be tunneled under Wayne Avenue. Thank you.

- RECORD #1112 DETAIL

First Name : Richard
Last Name : Meyers
Business Name : Peachwood Civic Association
Address : 14809 Peachwood Drive
City : Silver spring
State : MD
Zip Code : 20905
Email Address : Peachwood1270@verizon.net
Submission Content/Notes : You must ASAP build the Purple Line as a light rail to link Bethesda to College Park. We don't need our roads clogged with more traffic (e.g., buses). Please don't screw this up like the SHA has screwed the taxpayers with the white elephant ICC.

- RECORD #1356 DETAIL

First Name :	Pam
Last Name :	Browning
Business Name :	Petition Drive to Save the Trail
Address :	4317 Elm Street
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	

Submission Content/Notes : My name is Pam Browning. I spell it P-A-M, B-R-O-W-N-I-N-G. I am the organizer of the petition drive to save the Capitol Crescent Trail. I also was the organizer of the petition drive that successfully opened the tunnel that connects Bethesda from the west side to the east side and I was on the board of directors of an organization which contributed \$45,000 towards building the trestle, which connects the trail with west Silver Spring.

I care a lot about connected with Silver Spring. Without the tunnel and the trestle, several Silver Spring people would not be using that trail today. And there were many Purple Line advocates at that time who opposed the opening of the tunnel and the resurrection of the trestle are even taking up the tracks so that we can have a trail.

The issue of connecting with Silver Spring is a red herring. I support the extension of the Capitol Crescent Trail into Silver Spring and note that the Environmental Impact Statement says, states that the Jones Bridge Road alternative will make the same connection into Silver Spring as the light rail except that it won't destroy the trail in order to extend it.

Yes, we can connect Silver Spring with a beautiful, natural tree lined trail, in fact, the Jones Bridge Road alternative, since it costs less, would have more money left over for better trail connection.

The MTA's Environmental Impact Statement of the Purple Line is a arbitrary and legalistic study that completely ignores the reality that the Georgetown Branch Capitol Crescent Trail functions as one of the most popular urban parks and recreation areas in the nation and that it is surrounded by 17 acres of trees that will be destroyed by the Purple Line if it's on the trail.

The trail is used by hikers and bikers of all ages, races, ethnicities and abilities. It is enjoyed by the elderly, parents pushing their strollers, bird watchers, families with small children, casual cyclists, teens going to and from school, athletes in training and daily commuters.

The trail is often cited as one of the most important amenities and resources in the Metropolitan area. It was documented to have 10,000 weekly uses in 2006 and its use has grown substantially since that time. It is an essential link and a web of connecting trails in the region and for this reason it is heavily used by hikers and bikers from around the Metropolitan area.

And yet, there is no analysis in the DEIS of the significance of the trail to the neighboring communities or to the region. In the state's eyes, this popular trail is not considered by its definition to be a park recreation area or open space. And apparently for this reason the DEIS simply ignores the current use and value of the trail as such. This legalistic interpretation of the law is wrong.

The DEIS is not required to be blind to the popular use of an extraordinary value of the trail in the region. In fact, it must evaluate the impacts that various transit options would have on this important resource, regardless of its definitions.

And why isn't the ENVIRONMENTAL IMPACT STATEMENT analyzing and evaluating major significant tree loss under the Purple Line alternatives? Seventeen acres of mature trees are at stake. Thank you.

- RECORD #1205 DETAIL

First Name : Karren
Last Name : Pope-Onwukwe
Business Name : Prince George's Advocates for Community-based Transit
Address : 6001 43rd Street
City : Hyattsville
State : MD
Zip Code : 20781
Email Address :

Submission Content/Notes : Karren Pope-Onwukwe, K-A-R-R-E-N P-O-P-E - O-N-W-U-K-W-E. Onwukwe means anything in life can be overcome except for death. I think that's appropriate for this discussion because we are looking at financial constraints and many people feel that that may be a reason not to go forward. But I believe that this is an issue that we can overcome, the lack of funds and find the money and the will and the way to make the Purple Line a reality.

I live at 6001 43rd Street. That's in Hyattsville, Maryland, 20781. My office is in Lanham, which is also affected by the Purple Line. I am the co-chair of the Prince George's Advocates for Community-based Transit.

And as your first speaker today mentioned, Ben Ross, we have been laboring in this vineyard for many years. I thank you for coming here. I thank our Administration here in Maryland, the current Governor and of course we're looking forward to a new administration in Washington, D.C. And I think between the two we can look forward to a new vision of how we can make this happen.

Someone talked earlier about how can we go forward with this at this time? One thing is jobs, and I've heard that mentioned by everyone that has come up I believe. Once we break ground people are going to be working on getting this project completed. Economic stimulus. We need entrepreneurial incentives for people to start businesses.

And then finally, it makes sense. This makes so much sense. As I tell my son, who is a junior in college, I told him to do well in school but you got to have common sense if you want to go forward in life and be successful. And this is a common sense response to a much-needed project.

We thank you so much for coming to Prince George's County. We'd like to see the Purple Line continue all the way across the Bridge to get us to Virginia. Thank you.

- RECORD #1169 DETAIL

First Name :	Bill
Last Name :	Wilson
Business Name :	PG Advocates for Community Base Transit/Maryland Convention Council
Address :	6200 West Chester Park Drive
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	

Submission Content/Notes : I'm Bill Wilson, B-I-L-L, W-I-L-S-O-N. Thank you for the opportunity to present my views. I have lived in College Park at 6200 Westchester Park Drive for two years. That's right off of Kenilworth. From 1994 to 2006 I lived on Riverdale Road and Riverdale Park.

I have worked on the College Park campus since 1972 until I retired in 2006. I am very familiar with the eastern segment of the proposed purple line alignment choices.

For 35 years, I have been an active person in many environmental organizations in Maryland, especially the Maryland Conservation Council of which I currently am a Vice President.

For many years, I was an officer in the Baltimore area Transit Association. I helped organize and am now Treasurer of Prince George's Advocates for Community Based Transit. So I have a long standing interest in this kind of thing.

I speak in favor of the light rail transit option. This option would help reduce air pollution by removing excessive cars, especially single occupancy cars, from roads and streets in this vicinity.

I note at rush hour the congestion on Route 1 on the East/West Highway which is Route 410 on Kenilworth Avenue which is Route 201, and on Campus Drive, the main route through the University.

Reducing traffic congestion would be a major accomplishment of building the purple light rail transit line.

The option of bus rapid transit would not be good for a long-term solution. Busways are not so pedestrian friendly as rail and would create more pollution and more noise.

I did examine the draft EIS at the Greenbelt Library, especially the proposed alignments east of Adelphi Road. I support Alternative 7, the medium investment light rail transit from Adelphi Road east.

In terms of crossing the University campus, I strongly prefer the surface route for LRT along Campus Drive. Campus Drive is probably the most congested road on campus, largely because it's the real population center of campus close to many academic buildings and libraries and arts and sports venues.

Campus Drive near the Stamp Student Union is the hub for the university's own bus system. Running the purple line along Campus Drive would allow easy transfer from one system to the other.

Choosing the Prinkert gym alignment that would also move MTA buses there would be a more expensive alternative and would offer worse service to the population centers of the campus.

Moving east, I prefer the surface alignment along Kenilworth Avenue from River Road to Riverdale Road. Tunneling under the parkland would serve transit riders less well and would be much more expensive.

I want to emphasize the important of getting on with this project by deciding all the alignment issues and especially choosing the light rail transit alternative. Thank you for your attention.

- RECORD #1144 DETAIL

First Name :	Clareen
Last Name :	Heikal
Business Name :	Progressive Cheverly -Environmental
Address :	3117 Laurel Avenue
City :	Cheverly
State :	MD
Zip Code :	20785
Email Address :	

Submission Content/Notes : Hello. I am Clareen Heikal. First name is C-L-A-R-E-E-N, last name is Heikal, H-E-I-K-A-L.

My address is 3117 Laurel Avenue in Cheverly, Maryland. Today I'm representing Progressive Cheverly, a grass roots organization in Cheverly, Maryland.

Progressive Cheverly enthusiastically supports the purple line for the many reasons stated in the draft environmental impact statement, all of which match our guiding values and principles. Economic fairness, equality, sustainable economic practices and collectively working with other communities for the common good.

We believe that the purple line can be built with minimum environmental impacts while the long-term benefits, especially for the light rail transit option, will be enormous.

Specifically we want to weigh in on two points today. We are concerned about the opposition to the purple line from residents of the Chevy Chase area and members of the Columbia Country Club.

This seems to represent a not in my backyard attitude that does not fully appreciate the environmental and social benefits that the purple line can offer to all of the residents of this corridor.

The Columbia Country Club has been strongly resisting what appears to be a reasonable compromise for the purple line's passage along the Georgetown Branch right-of-way.

It is our understanding that this is a public right-of-way that was purchased by Montgomery County after the old railroad stop functioning in 1985 with the explicit purpose of using the segment between Bethesda and Silver Spring for recreation and transit.

It is also our understanding that the country club has fenced off approximately 4/5 of the public right-of-way for its private use.

We feel that the main considerations for MTA should be that the purple line is a proposed public transit system that is to be built on public lands.

Secondly, we believe in green initiatives that promote the kind of urban development that will protect and improve the quality of our environment.

In January, President Elect Obama will take office and we will have a President who understands the urgency of acting to protect our environment, decrease our dependency on fossil fuels and tackle the destructive climate change we are facing.

The purple line will be an important project to demonstrate that we take this challenge seriously. It is imperative that we get a green light to complete the purple line.

We agree with the purple line now that the high investment of light rail alternative while somewhat more costly face much greater dividends in the future as ridership grows and more residents seek mass transit and shorter commutes.

The purple line must be able to meet our needs not just today, not just in 2030, but in the long run.

We feel that this alternative will take more cars off the road other than

the other options and provide faster time, travel time.

The effects of the purple line will be a healthier environment that would allow for more family time, improved quality of air and water, decreased need of car ownership and decrease our collective carbon footprint.

As an added benefit, the Chesapeake Bay in our backyard will become healthier as more cars come off the road.

So in closing I would like to express gratitude to our Prince George's County government officials, our Prince George's County delegation in Annapolis and Senators Barbara McCluskey and Ben Cardin and Congresswoman Donna Edwards on Capital Hill for their support of this purple line. Thank you.

- RECORD #2264 DETAIL

First Name : Clareen
Last Name : Heikal
Business Name :
Address : 3117 Laurel Avenue
City : Cheverly
State : MD
Zip Code :
Email Address : ms.clare@verizon.net
Submission Content/Notes :
Attachments : Heikal_Clareen.pdf (3 mb)

Purple Line Public Hearings
November 19, 2008
Ritchie Coliseum, U of MD

Hello. My name is Clareen Heikal, residing at 3117 Laurel Ave, Cheverly, MD 20785. I am representing Progressive Cheverly, a grassroots advocacy group in Cheverly, Maryland.

Progressive Cheverly enthusiastically supports the Purple Line for the many reasons stated in the Draft Environmental Impact Statement, all of which match with our guiding values and principles - economic fairness, equality, sustainable environmental practices, and collectively working with other communities for the common good. We also believe that the Purple Line can be built with minimal environmental impacts, while the long-term benefits especially for the Light Rail Transit alternative, will be enormous.

Specifically, we want to weigh in on two points.

We are concerned about the fierce opposition to the Purple Line from residents of the Chevy Chase area and members of the Columbia Country Club. This seems to represent a “**Not In My Backyard**” attitude that does not fully appreciate the environmental and social benefits that the Purple Line can offer to **all** the residents of this corridor.

The Columbia Country Club has been strongly resisting what appears to be a reasonable **compromise** for the Purple Line's passage along the Georgetown Branch right of way. It is our understanding that this is a **public right of way** that was purchased by Montgomery County after the old railroad stopped running in 1985 with the explicit purpose of using the segment between Bethesda and Silver Spring for recreation and transit. It is also our understanding that The Country Club has fenced off approximately 4/5th the **public right of way** for its private use. The 100 foot right of way certainly seems big enough to accommodate a 25 foot transit way and a 10 foot hiker-biker trail with room (65 feet) for a landscaped buffer. We feel that the main consideration for MTA should be that The Purple Line is a proposed **public** transit system that is to be built on **public** lands.

We understand that the Georgetown Branch right of way is a beautiful and heavily used hiker-biker trail that will require some accommodations from the people in that area in order to accept the inclusion of a transit way for the Purple Line. Purple Line Now along with the Coalition for Capital Crescent Trail (CCCT) and the Washington Area Bicyclist Association (WABA), support the development of a workable transit-trail design. Hopefully, the majority of persons in the Chevy Chase area will come to realize that this can be done as well.

Secondly, we believe in “green” initiatives that promote the kind of urban development that will protect and improve the quality of our environment. In January President-elect Obama will take office, and we will have President who understands the urgency of acting to protect our environment, decrease our dependence on fossil fuels, and tackle the destructive climate changes we are facing. The Purple Line will be an important project to demonstrate that we take this challenge seriously. It is imperative that we get the **GREEN light** to complete the Purple Line.

We agree with Purple Line NOW that the High Investment Light Rail Transit alternative, while somewhat more costly, “pays much greater dividends in the future, as rider-ship grows and more residents seek mass transit and shorter commutes.” The Purple Line must be able to “meet our region’s needs not just today, or in 2030, but in the long term. We feel that this alternative will take more cars off the road than the other options and provide faster travel time. We do not believe that Bus Rapid Transit alternatives will do this.

The effects of the Purple Line will be a healthier environment that will allow for more family time, improve the quality of air and water, decrease need for car ownership, and decrease our collective carbon foot print. As an added benefit, the Chesapeake Bay, “*In Our Backyard*”, will become healthier as more cars are off the road.

One can hardly begin to imagine the long term positive impact that the PURLE LINE will have as it connects 4 metro stations,3 MARC train stations, and Amtrak. This is truly a regional solution to regional needs.

In closing, I would like to express gratitude to our Prince George's County government officials, our Prince George County delegation in Annapolis, and Senator Barbara Mikluski, Senator Ben Cardin, and Congresswoman Donna Edwards on Capitol Hill for their support of the Purple Line.

Respectfully submitted,
Clareen Heikal
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Cheverly, MD
(301) 773-0856
Ms.clare@verizon.net

- RECORD #1200 DETAIL

First Name : Rion
Last Name : Dennis
Business Name : Progressive Maryland
Address : 8770 Georgia Avenue
City : Silver Spring
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Zip Code : 20910
Email Address :
Submission Content/Notes : Rion Dennis, R-I-O-N D-E-N-N-I-S and I live at 1101 Ivy Club Lane, Landover, Maryland 20785.

Hello. Thank you for this opportunity to testify in favor of the Light Rail Purple Line inside the Beltway. My name is Rion Dennis and I'm the Political Director for Progressive Maryland. A coalition of over 40 statewide and local labor, civil rights, community and religious organizations as well as 15,000 individual members, all fighting for working families in Maryland.

The Light Rail Purple Line is an essential investment we must make in our citizens and working families in order to spur the regions' economic growth in these hard financial times. As a lifelong resident of Prince George's County who commutes into Montgomery County every day, I know first hand how important a Light Rail Purple Line would be for working families, as they will bring the job centers of the region to Prince Georgians'.

With uncertain gas prices and hour- long delays on the Beltway, to add more buses to congested roads is a recipe for more frustration and will require another solution in the not too distant future. A Light Rail Purple Line will give working families an inexpensive, reliable, and environmentally friendly alternative to get around the region.

For those reasons Progressive Maryland strongly supports building a Light Rail Purple Line to help revitalize Inner Beltway communities, alleviate traffic congestion, and bring vital jobs, resources, and opportunity to Prince Georgians and the National Capital Region as a whole. Thank you.

- RECORD #1442 DETAIL**First Name :** Herb**Last Name :** Ettel**Business Name :** Progressive Maryland**Address :** 8720 Georgia Ave**City :** Silver Spring**State :** MD**Zip Code :** 20910**Email Address :**

Submission Content/Notes : Herb, H-E-R-B, Ettel, E-T-T-E-L. More important is that I'm a staff editor representing Progressive Maryland, an organization of grass root organizations with over 15,000 supporters plus 40 affiliated community organizations. We strive to improve the lives of working families in our state and we strongly support building a high investment light rail Purple Line.

Employees and patrons of businesses and organizations in our region would benefit greatly from the savings and time and money and increased customer sales, customers and sales. Tens of thousands will enjoy shorter commutes and save precious time to be more involved with their families and communities. Light rail is far more cost effective than bus lines and better for the environment in many ways. In fact, the Purple Line's entire cost may well be more than made up in medical cost savings alone that result from reduced pollution and stress and increase quality of life in our region.

The Purple Line is vitally needed. Working families who often can not afford cars or soaring gas prices and for whom getting to work by existing bus service is often slow, unreliable and a hardship and who's time in their lives, especially when they're having to piece together two and three jobs will especially benefit.

One last point. It's often said you get what you pay for. Or as my father often said, the cheap pay twice. The cheap pay twice. If you build a Purple Line on the cheap, it won't meet our needs. We'll be disappointed, we'll be paying more down the road in many ways. For decades to come. But if we show the wisdom now of that new deal generation, our grandparents, and invest fully to build this critical infrastructure the way it should be, it will be a gift that keeps on giving from this generation to ourselves, our children and theirs and all who come after.

Attachments : Written Testimony. Progressive MD.pdf (1 mb)

**TESTIMONY OF PROGRESSIVE MARYLAND IN SUPPORT OF
THE PROPOSAL FOR A HIGH-INVESTMENT LIGHT-RAIL PURPLE LINE**

Submitted Nov. 18 by Herb Ettel, Editor on staff of Progressive Maryland.

(This testimony will be kept to one-page in recognition of time constraints, the large number wanting to testify, and the greater expertise of other proponents of our view.)

Progressive Maryland is a grassroots, nonprofit organization of over 15,000 supporters plus 40 affiliated religious, community, and labor organizations. Through research, public education, and direct political action we strive to improve the lives of working families in our state.

With our state headquarters located near the Silver Spring Metro station, and most of our staff and many of our supporters living along the busy corridor through which the Purple Line would pass, Progressive Maryland has a keen interest that the line being built soon and in the best way. We know the employees and patrons of a great many other businesses and organizations in our region would likewise benefit greatly from the savings in time and money, and increased customers and sales. Tens of thousands of current transit riders will enjoy shorter commutes and save precious time to be more involved with their families and communities.

Light rail is far more cost-effective than bus lines. One train can consist of up to three cars holding up to 200 riders apiece (double that of a bus), so one train operator can handle six times the capacity of a bus. Rail cars also have a longer lifespan.

Rail transit is better for the environment. Salt, chemicals, and oil run-off from buses on paved bus lanes contributes to water and soil pollution. Diesel fumes in congested areas have a negative impact on public health and the quality of the pedestrian environment. In fact the Purple Line's entire cost may well be more than made up in medical cost savings alone that result from reduced pollution and stress, and increased quality of life in our region. Even those who continue to commute by automobile or bus will benefit greatly from less traffic congestion.

With gas prices rising, global warming, and continuing substandard air quality, the Purple Line is vitally needed as a vital component in addressing both our economic and environmental crises, and improving the economy, culture and lives throughout our region. Working families, who often cannot afford cars and for whom getting to work by existing bus service is often slow, unreliable and a hardship, will especially benefit. ###

* "You get what you pay for."

Like our grandparents in their New Deal wisdom,

We must pay for the best Purple Line now,

for us, our children, and theirs, and all after them.

- RECORD #760 DETAIL

First Name : Stephan
Last Name : Sylvan
Business Name : Progressive Neighbors
Address : 7981 Eastern Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : sylvan.stephan@earthlink.net
Submission Content/Notes : Dear Mr. Madden,

I strongly encourage MTA to do everthing it can to build the Light Rail
Purple Line as soon as possible.

Thank you.

Stephan

- RECORD #2773 DETAIL**First Name :****Last Name :****Business Name :** Purple Line Now**Address :****City :****State :** MD**Zip Code :****Email Address :****Submission Content/Notes :**

Attachments : PLN -AA-DEIS Comments Final-011309.pdf (2 mb)
EnReviewRept&PorcariCoverLtr121508.pdf (435 kb)
PLN comments coverltr011309.pdf (335 kb)

Comments on the Maryland Transit Administration's Alternatives Assessment and Draft Environmental Impact Statement For the Purple Line Transit Project



January 13, 2008

Executive Summary

Purple Line *NOW!* (PLN) urges the Maryland Transit Administration to recommend to Governor O'Malley selection of **the Medium Light Rail Transit option, with some adjustments, as the Locally Preferred Alternative for the Purple Line.** We urge MTA to proceed with the submittal of a New Starts Criteria package to FTA so that Maryland can proceed with preliminary engineering of the Medium Light Rail Transit (M-LRT) option for the Purple Line on the most expeditious timeline.

The Governor should support the Medium Light Rail Transit option for the following overriding reasons:

1. The Light Rail Purple Line will be a groundbreaking and successful inner suburban transit project of national importance as the United States tries to encourage the accommodation of future growth in a manner that is more efficient in terms of use of energy and land. This will help us get the greatest level of federal funding possible for the project.
2. The M-LRT option is consistent with State of Maryland policies in support of Smart Growth that are designed to protect our small state's remaining undeveloped or agricultural resources.
3. The M-LRT option is the most affordable and cost effective option with the best chance of meeting long term ridership demand in the corridor.
4. The M-LRT option is the one that is most consistent with relevant County Master Plans for segments of the project for nearly two decades and it will help Montgomery and Prince George's Counties meet important and longstanding policy goals on which these master plans are based.
5. The M-LRT option has received the broadest local support, with positive comments coming to MTA from an overwhelming number of municipalities that have commented on the project including New Carrollton, College Park, Takoma Park, Greenbelt, Edmonston, Hyattsville, Bowie, and others. Comments in support of the M-LRT option have also come from dozens of civic organizations representative of neighborhoods along the alignment between Bethesda and New Carrollton
6. The M-LRT option has received overwhelming support from the regional business, labor and environmental communities. Major organizations representing these important constituencies are ready to work with the Governor to obtain federal funding for this project.
7. The M-LRT option is supported by many organizations concerned about environmental justice issues including CASA of Maryland, Progressive Maryland, Jews United for Justice, and others.
8. The M-LRT option is supported by more than a dozen student groups, including the major student government organizations at the 35,000 student University of Maryland.

PLN believes the AA/DEIS has been carefully prepared but tends to conservatively state the project benefits while the costs and impacts of the project are often stated in a worst-case manner. Despite this, the M-LRT option is well within the range of cost effectiveness under current FTA guidelines to receive approval by the FTA to move forward into design. Additionally, the projected ridership for the M-LRT option is higher than that for most comparable transit projects across the country.

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PLN recommends minor adjustments to the M-LRT option as a basis for moving forward. Summarized in geographic (not priority) order from west to east, these include:

1. Make provisions for the hiker-biker trail to continue passing through the Air Rights Building Tunnel in Bethesda, and increase the proposed standard for the off-road Capital Crescent Trail from 10' to 12' with two 2' shoulders where space is adequate.
2. If tunnel options are explored for the east Silver Spring segment, make provisions to include a stop at Fenton Street serving Downtown Silver Spring, Fenton Village and Montgomery College; if a Fenton Street stop cannot be included with a tunnel option, then we believe preliminary engineering should focus on developing the at-grade alignment for this important segment in a manner that responds especially carefully to local concerns.
3. Devote particular attention in preliminary engineering to stream valley crossings, particularly Sligo Creek, identified as the location of the greatest park impacts.
4. Review the costs and benefits of a grade separation at New Hampshire Avenue to determine if this is warranted for operational and safety reasons. If so, include this option in the preliminary engineering phase.
5. Review grade separation options for the Kenilworth Avenue/East West Highway intersection, including the possibility of an overpass as suggested in testimony from numerous individuals at the College Park and New Carrollton hearings.
6. Evaluate design concepts for the New Carrollton terminus allowing for continuation of the Purple Line further into Prince George's County in the future.

1. INTRODUCTION

Purple Line *NOW!* (PLN) was formed in support of a light rail transit (LRT) connection between Bethesda and New Carrollton seven years ago. The AA/DEIS substantiates our belief that a light rail transit option for the Purple Line will prove cost effective in the eyes of the Federal Transit Administration (FTA). Of equal importance, the AA/DEIS demonstrates that the medium LRT option will be successful in serving the east-west transportation needs well into the future – and beyond the narrow 2030 horizon that is the focus of most data in the DEIS. The Purple Line will help reorient development in two of Maryland’s most populous inner suburban counties towards transit and away from single occupancy vehicles in accordance with master plans of both counties and the smart growth vision of the State.

Our comments are intended to highlight areas where we agree with the MTA’s analysis while also pointing to issues that need additional attention during preliminary engineering to ensure the most successful and community-friendly transit project.

The point we wish to make most emphatically in these remarks concurs with the EnReview Technical Review provided as an attachment to our comments:¹

“The benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated.”

Our comments are organized by section of the DEIS, with references to the technical reports relating to those sections where appropriate. The rest of our comments are organized in accordance with the outline of the AA/DEIS:

1. In Section 2, we explain why we view the M-LRT option to be most consistent with the Purpose and Need of the Purple Line.
2. In Section 3, we comment on the alternatives considered in the DEIS and present some recommendations for modifications to the M-LRT option for consideration as the project moves forward.
3. In Section 4 we comment on the transportation and traffic section of the DEIS.
4. Section 5 of our comments reviews the environmental issues reviewed in the DEIS.
5. Section 6 includes comments on costs and funding.
6. Section 7 includes our summary as to why the M-LRT should be the selected alternative
7. Section 8 includes our comments on MTA’s public outreach effort.
8. Section 9 is our conclusion.

¹ LaCombe, Sharon, and Carter, Maurice; Purple Line AA/DEIS Technical Review, EnReview, 2008, page 2

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2. PURPOSE AND NEED FOR THE PURPLE LINE

The key statement of the Purpose and Need document for the Purple Line is:

“Faster, more direct and more reliable east west transit service in the Purple Line corridor which would connect the four major activity centers”²

Purple Line NOW! believes that the Medium LRT option (M-LRT) that utilizes the master plan alignment in Montgomery County best meets the Purpose and Need criteria of the Purple Line.

- a. We do not believe that alignments utilizing Jones Bridge Road meet the Purpose and Need because the options proposed will not provide more direct connections between the two activity centers of Bethesda and Silver Spring.

Critics of use of the master plan alignment for the Purple Line have pointed to the Base Realignment and Closure (BRAC) impacts as justification for reviewing the alignment between these two major CBDs. These critics support an option that will more than double travel time between the two downtowns. Yet BRAC will increase jobs in the Medical Center area by between 2,200 and 2,500 jobs – a small percentage of the 73,000 jobs in the Bethesda CBD – Medical Center area. The comparison is even more supportive of a direct route to downtown Bethesda when projections for residential development are considered. Table 1-5 demonstrates the significant growth projected for the Bethesda CBD in terms of both employment and housing. Major residential development is projected for both Silver Spring and Bethesda, while residential development in the Medical Center area is not expected to increase significantly.

Table 1-5: Household and Employment Forecasts

Location	Households			Employment		
	2000	2030	% Change	2000	2030	% Change
Bethesda CBD	6,720	12,938	93%	34,833	41,567	20%
Silver Spring CBD	5,646	14,016	148%	29,741	34,626	16%
New Carrollton	854	1,430	67%	8,705	15,339	76%

Source: Metropolitan Washington Regional Activity Centers and Clusters, Round 7.0 Forecasts, Metropolitan Washington Council of Governments 2007.

- b. We do not believe that the No Build and Transportation Demand Management options meet the project Purpose and Need. They will not be faster or more direct. **Both options will ensure that traffic congestion will have a significant negative impact on economic vitality and livability in the corridor in the future.**

² (2008) MTA, Purple Line AA/DEIS; Executive Summary, page 2

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- c. The M-LRT option for the Purple Line is most consistent with applicable master plans for both counties. It will foster the kind of development sought by both counties because Light Rail Transit is a known catalyst for pedestrian and transit oriented revitalization. Trips within the Purple Line corridor are expected to increase by 43% by 2030. Development in the corridor is expected to be smart growth: mixed use with a pedestrian and transit orientation. The M-LRT option will fit into this vision for the future of the corridor. It will support transit and pedestrian-oriented redevelopment in the New Carrollton Metrorail area as well as in College Park.

Supporters of Bus Rapid Transit point to cities like Ottawa, Canada as demonstrating that BRT is also conducive to development. However, Ottawa is now seeking to expand its transit system with new Light Rail Lines and reviews of the busway there are mixed.³ One thing is clear, it is not easy to move forward with a BRT line and expect that it will be easy to subsequently change it into a LRT line.

- d. The AA/DEIS report demonstrates the tremendous transit market in the Purple Line corridor as well as how the populous corridor is closely linked to the transit accessible and transit dependent regional core. These corridor attributes bode well for the success of the Purple Line:

- The corridor has approximately 169,000 daily transit trips with one or both ends of the trip in the corridor (9.5% of the total regional transit trips).
- 44,000 trips have both ends in the corridor. 60,000 trips are made between the corridor and some parts of the District of Columbia.
- 134,000 are associated with the major activity centers.
- By 2030, daily transit trips are expected to grow by 52% from 1,953,000 to 2,711,000 under the no-build scenario. Those associated with the corridor will grow by 65,000 or 38% to 234,000⁴.

Table 3-9: Regional Transit Trips

	Existing 2000	2030 No Build	2030 TSM	2030 Representative Build Alternative
Trips Associated with Purple Line Corridor	169,000	234,000	302,000	334,000
Trips within Purple Line Corridor	44,000	62,000	65,000	75,000
Total Regional Trips	1,778,000	2,711,000	2,727,000	2,749,000

- e. Purple Line success will result from the fact that it serves an existing highly transit-oriented corridor while also attracting ridership transitioning from personal automobiles. The later

³ (2006) Lietwiler, Charles; Ottawa Busway; http://www.purplelinenow.com/published/news/ottawa_2006.html

⁴ AA/DEIS, p. 1

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market will only be developed if a quality rail option is selected for the project. The project therefore serves two purposes of importance to the Federal Transit Administration (FTA):

- providing better service to low income “Economic Justice” populations and
- providing a quality service that will get more people out of their cars and onto Purple Line trains.

The Purple Line corridor is already developing with a transit-oriented population, even in the wealthier (western) section of the corridor as is shown on Table 1-4 of the AA/DEIS (reprinted below). It is important to note that the relatively high numbers of households without cars will increase in the future due to the aging of the population, difficulty of driving in the increasingly congested area and the cost of owning a motor vehicle. These demographic trends should be considered in the Final DEIS and support the strong ridership.

The Final DEIS should also consider the tremendous regional transit ridership growth of the past two years – a trend that does not seem to be abating despite some softening in gasoline prices.

**Table 1-4: Percent of Households
without a Vehicle**

Community	Percent of Households without a Vehicle
Bethesda	18%
Chevy Chase	11%
Rock Creek Forest / Lyttonsville / Rosemary Hills	13%
Woodside	16%
Silver Spring	24%
East Silver Spring	12%
Long Branch	18%
Takoma Park	16%
Langley Park	25%
Lewisdale	15%
Adelphi	9%
College Park	10%
Riverdale Park / Heights	15%
Glenridge / Beacon Heights	14%
New Carrollton	18%
West Lanham Hills	9%
Montgomery County	7%
Prince George's County	10%
State of Maryland	11%

Source: US Census 2000, Summary File 3

Note: Shaded rows are higher than the corresponding county percentage.

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- f. By 2030 and beyond, under the No Build conditions, roadway congestion will increase due to population and employment growth. Without the Purple Line, transit travel time and reliability will deteriorate as is shown on Table 1-6 of the AA/DEIS. All major roadways are projected to deteriorate to Level of Service (LOS) "F" conditions in the morning and afternoon rush hours. TSM is similarly inadequate. Road widening throughout the area would require far more extensive taking of property and economic dislocation than that projected for the Purple Line and is clearly not a likely or desirable option for addressing traffic congestion. We believe this leads to the following conclusions which form the basis for the tremendous support the Purple Line has received from environmental groups supportive of the light rail Purple Line⁵
- We must make a significant investment in a transit line to provide a good alternative to driving in the future.
 - If we do not improve transit in the corridor, more of the future population growth will need to be accommodated in sprawl type development to the detriment of Maryland's important natural resources.

Table 1-6: Traffic Levels, 2005 and 2030

Location	2005		2030 Projections	
	AADT ¹	LOS AM/PM	AADT	LOS AM/PM
Capital Beltway, Wisconsin Avenue (MD 355) to Georgia Avenue (MD 97) ²	227,575	F/F	285,000	F/F
Capital Beltway, Georgia Avenue (MD 97) to I-95 ²	215,150	F/F	269,000	F/F
Capital Beltway, I-95 to US 502	241,425	E/E	302,000	F/F
Jones Bridge Road at Connecticut Avenue (MD 185) ³	22,300	F/F	27,900	F/F
University Boulevard (MD 193) at New Hampshire Avenue (MD 650) ²	49,825	F/F	62,300	F/F
East West Highway (MD 410) at Connecticut Avenue (MD 185) ²	29,375	F/F	36,700	F/F
East West Highway (MD 410) at 16 th Street (MD 390) ²	32,475	F/F	40,600	F/F
East West Highway (MD 410) at Baltimore Avenue (US 1) ²	25,925	F/F	32,400	F/F
East West Highway (MD 410) at Kenilworth Avenue (MD 201) ²	40,950	F/F	51,200	F/F
Annapolis Road (MD 450) at Veterans Parkway (MD 410) ²	37,925	F/F	47,400	F/F

Notes:

¹ Average Annual Daily Traffic

² Source: MD State Highway Administration, 2005

³ Source: Purple Line Traffic Studies, 2005

- g. While high investment Light Rail Transit demonstrates the highest ridership and fastest travel time in the 15 year time frame that is the basis for the DEIS analysis, we recognize that the overall cost is daunting. For this and other reasons described in the previous section, we support the M-LRT option as the basis for moving forward with some

⁵ Supportive environmental and planning groups include the Action Committee For Transit, the Chesapeake Bay Foundation, the Chesapeake Climate Action Network, Clean Water Action, Coalition for Smart Growth, Environment Maryland, 1,000 Friends of Maryland, Prince George's Advocates for Community Based Planning, the Sierra Club and others.

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adjustments discussed below in Section 3. We also believe that the M-LRT, by providing more locally serving stops, is better suited to the characteristics of the corridor than the high LRT option.

3. ALTERNATIVES CONSIDERED

The MTA is to be commended for having completed an objective, efficient and fully informed evaluation of alternatives consistent in every way with FTA's congressional mandate.

- a. **Rejected Options:** Since the selection of the Purple Line corridor for study of transit options, many options have been rejected. Opponents of the M-LRT continue to call for reconsideration of these options. PLN supports the rationale for the elimination of further study of all options that have been deemed unacceptable:
 1. Heavy rail between Bethesda and Silver Spring was rejected due to the \$926 million price tag (2000). In today's funding environment, such an option would have even less likelihood of gaining funding, and FTA cost effectiveness criteria would ensure that it would not continue eastward to serve Prince George's County
 2. The proposed outer Purple Line was similarly rejected (\$5 billion +/-). This proposal would have little value to the Environmental Justice populations served by the M-LRT Purple Line.
 3. The proposed Purple Line Loop through Medical Center (in Montgomery County) was rejected because it would have required taking property from 25 residences along the CSX right of way (ROW), had significant impacts on Rock Creek Park, was more than twice the cost of the equivalent section of the Purple Line, and had no viable way of being extended through to Prince George's County.
 4. Use of Rt. 410 from Bethesda to Silver Spring was rejected because it could not compete with use of the Georgetown Branch right of way in terms of cost.
 5. Use of Rt. 410 through Takoma Park was rejected because it would bypass Long Branch and the Takoma Langley Crossroads area where both counties and the City of Takoma Park want to see revitalization.
- b. **No Build and Transit System Management (TSM)** – PLN believe the AA/DEIS analysis clearly demonstrates that these two options will not prevent the degradation of transit service in the corridor and therefore should be rejected as not adequately meeting the Purpose and Need for the Purple Line. The assessment of these options demonstrates the importance of action to ensure that future traffic congestion in the Purple Line corridor does not degrade the regional economy and quality of life.
- c. **Bus Rapid Transit Options** - In 2004, the administration of Governor Robert Ehrlich added the Jones Bridge Rd. option for the Purple Line, and also broadened the scope to include an

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evaluation of Bus Rapid Transit. While PLN disagreed with the proposed use of Jones Bridge Rd. for reasons stated above under Purpose and Need, we believe MTA has developed a reasonable spectrum of options allowing the Governor to select the best option for recommendation for Preliminary Engineering. Inclusion of the three BRT options helps to underline the advantages of the M-LRT option using the Master Plan alignment.

1. **Low BRT:** This option has gained little support during the AA/DIES hearings. We believe it does not provide a good enough alternative to driving to tap anywhere near the ridership or meet future demand in the corridor.
 2. **Medium BRT:** We oppose this option which does not connect directly with the Bethesda Central Business District. Travel time from Bethesda to Silver Spring is increased from 8 minutes (M-LRT option) to 20 minutes for this option which utilizes Jones Bridge Rd. Doubling the travel time for the project segment with the strongest ridership potential is a fatal flaw of the medium BRT option.
 3. **High BRT:** The high BRT option begins to have costs closer to those of the rail option without the certainty of capacity for the longer term that can be assured with the LRT option. We also oppose this option which will be expensive and run the busway along the Georgetown Branch while not attracting as many riders as the Light Rail transit options.
- d. **Light Rail Transit Options:** During the course of the Purple Line study, the concept for the project has evolved. Initially the focus was on the connections to Metrorail stations and a speedy trip between them. Subsequently, as ridership concepts were developed and evaluated, a focus on the service to communities through which the Purple Line will pass has become more important. This focus supports the reality that the vision for the project must be a compromise between speed and service to localities. PLN supports this evolution of the vision, because we believe the typical Purple Line rider will be looking for access and reliability over speed and that a plan that has few stops along the densely populated corridor is a plan that will not serve these communities well. MTA's ridership analysis supports the view that the project will be successful precisely if it has more stops along the way.

As the importance of the Purple Line as a local-serving transit line became more evident during the development of the AA/DEIS, and given that funding realities limit consideration of underground stations, the evolution in the analysis supported the original concept for the Purple Line as a predominantly at-grade light rail system.

All of the three LRT options include two short tunnels – one from Wayne Avenue to Arliss St. and the other from University Boulevard under Adelphi Rd to Campus Drive.

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1. **Low LRT:** This option appears to be not enough of an investment to attract ridership and received little support during the AA/DIES comment periods.
2. **Medium LRT:** PLN supports this option with the following modifications which are presented in geographic (not priority) order from west to east:
 - a. Include provisions for the hiker-biker trail through the Air Rights Building Tunnel.
 - b. Increase the proposed standard for the off-road Capital Crescent Trail from 10' to 12' with two 2' shoulders where space is adequate.
 - c. If tunnel options are explored for the east Silver Spring segment, make provisions to include a stop at Fenton Street serving Downtown Silver Spring, Fenton Village and Montgomery College; if a Fenton Street stop cannot be included in a tunnel option, then we believe preliminary engineering should focus on developing the most community-friendly option for this important segment.
 - d. Devote particular attention in preliminary engineering to the Sligo Creek crossing, identified as the location of the greatest park impacts.
 - e. Review the costs and benefits of a grade separation at New Hampshire Avenue to determine if this is warranted for operational and safety reasons; if so include this option in the preliminary engineering phase.
 - f. Review grade separation options for the Kenilworth Avenue/East West Highway intersection, including the possibility of an overpass as suggested in testimony from numerous individuals at the College Park and New Carrollton hearings.
 - g. Evaluate design concepts for the New Carrollton terminus allowing for continuation of the Purple Line further into Prince George's County in the future.
3. **High LRT:** The high option provides for faster travel speeds but we believe the resultant loss of stops will be a bad tradeoff between this and the medium LRT option. The high investment option would also be more difficult to finance than the M-LRT option.

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4. TRANSPORTATION AND TRAFFIC

EnReview observes that *“the traffic impact assessment used forecasted travel data from the regional council of governments. An appropriate traffic growth rate factor was used to forecast future No/Build/Build Conditions. **The analysis considers conflicts to other models of transportation and is a complete representation of projected impacts**”*⁶

The DEIS clearly demonstrates that traffic congestion will increase in the Purple Line corridor, with limited transportation improvements programmed to accommodate this growth. While the No Build conditions will include the new Metrorail entrance in Bethesda as well as the Sarbanes Transit Center in Silver Spring and Takoma/Langley Park Transit Center, the only roadway improvements of any consequence are for north-south roads crossing the Purple Line corridor (e.g. Kenilworth, Rt. 1).

Given this situation, the AA/DEIS assessment puts end to end run time for the TSM alternative at 108 minutes nearly double the Medium Investment LRT option (59 minutes). Given the difficulty of maintaining bus schedules on the corridor under current conditions, a greater variation in run time can be expected under future higher traffic conditions. The AA/DEIS reports that travel time on the J-4 bus line can run up to 50% higher than the scheduled times.⁷

The traffic analysis concludes that build options can be selected which maintain traffic conditions while providing a superior transit alternative to what exists today. Six build alternatives would result in adverse effects to traffic at up to four of the 64 key intersections. The primary mitigation strategy will be the construction of turn lanes.

a. Transportation and Traffic data supportive of the M-LRT option.

1. New transit trips are projected to be 19,200 compared to 8,200 under TSM, 15,300 under the medium BRT option and 17,700 under the high BRT option.⁸
2. The percentage increase in user benefits is far higher for M-LRT over M-BRT: 174% compared to 112%.⁹
3. The mode specific user benefits are 225% over TSM for the M-LRT option, compared to 155% for the M-BRT option.¹⁰
4. The reduction of automobile trips is higher in every Traffic District for M-LRT over M-BRT.¹¹

⁶ EnReview, page 13

⁷ AA/DEIS, page 3-2

⁸ IBID, Table 3-8, page 3-5

⁹ IBID, Table 3-12, page 3-7

¹⁰ IBID, Table 3-13, page 3-8

¹¹ IBID, Table 3-16, page 3-9

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5. University of Maryland trips: The UM community is likely to demonstrate considerable elasticity of demand and we believe the final DEIS should explore institutional relationships that might foster higher ridership. We point to the University of Utah which has stimulated ridership through a U-Pass system that results in more than 33% of the 39,000 students and employees using transit to get to the university.¹² Only 1,500 people used transit to get to campus in 1991, a number which was increased to 6,500 when the transit subsidies began – before the light rail line. With TRAX light rail service to campus, the number has fluctuated between 11,700 (January, 2008) and 13,000 (December, 2008).

- b. Projected Level of Service Impacts: Table 3-17 and Table 3-18 suggest the following:¹³
 1. Eliminate from further consideration the high LRT option as currently conceived due to negative impacts on three intersections (Wayne/Dale, Wayne/Mansfield/Wayne/Sligo). Similar impacts are not projected to occur under the M-LRT option.
 2. Eliminate further consideration of the at-grade Campus Drive/Rt. 1 crossing in favor of the proposed traffic-limited crossing at Rossborough Lane.

- c. Pedestrian and Bicycle Access: The M-LRT option will bring substantial pedestrian benefits to the Purple Line corridor. We strongly support these upgrades as an integral part of the transportation project.
 1. Completion of the Capital Crescent Trail between Bethesda and Silver Spring (4.5 miles) including safe grade separations for trail users at Connecticut Avenue, Jones Bridge Rd., 16th St, Spring St. and Colesville Rd.
 2. Completion of Green Trail from Fenton St. to Sligo Creek Parkway in Silver Spring.
 3. Completion of segment of Metropolitan Branch Trail in Silver Spring
 4. Pedestrian upgrades associated with the reconfiguration of University Blvd.
 5. Improved signalization of crosswalks throughout the project area.

- d. Pedestrian Recommendations: We recommend that the project include the following important trail connection:
 1. Cross campus bike lanes connecting to Paint Branch Trail, from University Boulevard through east campus in the University of Maryland/College Park area.

¹² Brandon Loomis "Transit the Smart Thing on U. Campus"; Salt Lake Tribune, January 9th, 2009

¹³ AA/DEIS, Table 17, page 3-15

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5. ENVIRONMENTAL RESOURCES, IMPACTS AND MITIGATION

- a. Introduction: The most important reason for moving forward with a major investment like the Purple Line is that the project will help encourage a more sustainable development pattern in the State of Maryland. The inner suburban areas served by the Purple Line are transitioning from heavy reliance on automobiles dependence to a far greater transit orientation. This evolution has been taking place over the past 30 years, and the Purple Line will accelerate it. According to Figure 4 1-3, the percentage of households in the study corridor without automobiles is about 17%, a number that we believe will increase given the attractiveness of living in the inner suburban ring for many demographic segments with a lower ration of automobiles.

Given the context of the corridor and the extent of natural resources it is impressive that fewer negative environmental impacts are projected to result from the project.

- b. Section 4.1 - Land Use and Economic Activity

The demographics of the Purple Line corridor support the M-LRT investment for reasons going beyond the purely transportation rationale for the project. There are few corridors under study for transit in the United States with existing and anticipated land uses, a real estate market, and sociological conditions so favorable to the successful development of a rail transit line. As is shown in the DEIS:

1. 30% of the study area population is African American, 25% is Hispanic;
2. 18% of residents in the important Langley Park area are living below the poverty line.
3. The population of the two counties served by the Purple Line is expected to grow significantly - 31% in Montgomery County and 23% in Prince George's County.
4. The corridor, with an existing population of 141,000 people is expected to grow at the rate of region.
5. 21% of the corridor's working population use public transportation. This is significantly higher than either counties overall transit usage.
6. Future job growth in the corridor will be substantial; Montgomery County is expecting a 29% increase in jobs by 2030, with Prince George's expecting a 68% increase. Jobs in the corridor are expected to increase by 32%.

PLN believes the M-LRT option for the Purple Line will support the type of land use synergies in the corridor that are desired by a strong majority of Prince Georges' and Montgomery County residents. Light rail will encourage the urban street life shown in the following photographs while BRT will not:

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Figure 1: Houston Texas (photo: Mike Harrington, www.lightrail.net)



Figure 2: Portland Oregon Photo: John Schneider www.Lightrailnow.org)

We also believe that LRT is more compatible with moderate density areas and the hiker-biker trail as shown on the next two photographs:

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Figure 3: Germany – pedestrian crossing of LRT line (in grass tracks) Photo: Anne Ambler



Figure 4: Rheinstetten, Germany – LRT in bike-friendly village center – grass tracks in background; photo: Jon Bell, <http://web.presby.edu/~itbell/transit/images/Karlsruhe/S2-Rheinstetten.jpg>

- c. Light Rail and Property Values: A commonly repeated fear during the planning of rail projects (LRT) and mass transit systems is that such projects do more harm to neighborhoods than good by causing a decrease in property values. However, the most up-to-date studies of Light Rail in the United States clearly show otherwise and MTA should

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include more information on this in the final DEIS. Far from “letting the neighborhood go to hell”, closeness to rail transit is shown to have positive impacts on property values.^{14 15}

The benefits of light rail to land value have been described as two-fold: first, transit opens access to other parts of the region; then, this increased accessibility amplifies the attractiveness of the properties.

Data from US cities with light rail lines confirm the assertion that transit has a positive effect on the properties it serves.

1. **San Diego:** A 1995 study reported that “the typical home sold for \$272 more every 100 meters closer to a light rail station.”¹⁶
2. **Dallas** (DART): Separate studies in 2002 and 2003 discovered that property values near light rail stations rose higher than those properties not served by rail. In one study, property values rose 39% more than a control group not served by rail. Another study found that median residential property values increased 32.1% near rail vs. just 19.5% in other areas. For commercial properties, the increase was 24.7% vs. 11.5%.¹⁷
3. **Portland** (MAX): A series of studies from the 1990s all found that proximity to light rail stations increased the value of residential properties. One study found that correlations between the distance to light rail station and home prices translated to \$75 per 100 feet. Another study found that a typical house sold for about \$663 more per 100 feet closer to a station.¹⁸
4. **Denver:** Homes near a light rail line that opened in 2006 have increased in value by an average of 4% over a period of two years, while the Denver market as a whole has decreased by an average of 7.5%¹⁹. Positive data for transit accessible property in Denver has even come during the more recent economic downturn.²⁰

¹⁴ Litman, T. (2007) Evaluating rail transit criticism. Victoria Transport Policy Institute
<<http://www.vtpi.org/railcrit.pdf>>

Diaz, R. B. Impacts of rail transit on property values. Booz Allen & Hamilton Inc. Mclean, VA
<http://www.apta.com/research/info/briefings/documents/diaz.pdf>

(2004) Light Rail Systems and Property Values; <http://www.slp2.org/documents/propertyvals04.pdf>

¹⁵ (2003) Rail Transit and Property Values; American Public Transportation Association;
http://www.apta.com/research/info/briefings/briefing_1.cfm

¹⁶ (2001) Parsons Brinkerhoff: The effect of rail transit on property values: A summary of studies. (Draft)
<http://www.reconnectingamerica.org/public/show/bestpractice162>

¹⁷ South Sacramento Corridor Fact Sheet; <http://www.sacrt.com/documents/SLP2.pdf>

¹⁸ (2001) The effect of rail...

¹⁹ (2008, Oct. 29) Jackson, Margaret . Light-rail can turn into money train. *The Denver Post*, p. Business
<http://www.denverpost.com/news/ci_10850014>

²⁰ (2008, 11/2) Kraft, Kristal Light Rail Rocks Solid for Home Values Along the Line

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d. Section 4.3 - Environmental Justice

The Light Rail Purple Line rates very high on FTA criteria of service to low income communities. In fact, this is a major strength of the project compared to some others in the United States.

There is much enthusiasm for the project in Long Branch, Riverdale Park and Takoma/Langley Crossroads where a strong majority is very certain the project will be popular and successful. This has lead to concerns that should be addressed by Montgomery and Prince George's Counties as the Purple Line moves forward:

1. Both counties will need to expand policies that increase economic activity in communities along the path of the Purple Line while also expanding affordable housing. This can be done through rental stabilization and new construction done with thoughtful planning.
2. We urge MTA to ensure that construction of the M-LRT Purple Line includes targets for local low income workers.
3. Table 4.1-1 shows projected business property displacements.²¹ The number of displacements is only about 1 per mile. Every effort should be made to preserve and expand existing minority owned businesses along the path of the Purple Line. Relocation assistance may be required for some businesses that will suffer during construction of the line. While some businesses will be displaced in the Purple Line corridor under the M-LRT scenario, we note that opportunities for business expansion will be created at the areas where these dislocations are expected. Along University Boulevard, Kenilworth Avenue and East West Highway the Purple Line will encourage changes consistent with master plans and provide for expanded business opportunities.

e. Section 4.4 - Parks, Open Space and Appendix "Preliminary Section 4F Evaluation Technical Evaluation Rept."

Given the 16 mile extent of the Purple Line, it is fortunate that the overall impact on parks and open space is as low as indicated in the pertinent sections of the DEIS report.

We support the MTA plan to pursue a finding of "de minimis" impact to lands protected under Section 4 (f).

The DEIS observes that the project will have modest impacts on parks through which it passes, placing the overall impact at 2.38 acres for the M-LRT option. Most of this impact is on stream valley parks that must be crossed along any route from Bethesda to New Carrollton. These include Sligo Creek Stream Valley Park (units 1 and 2 - 0.9 acres of the 200 acre park) and the Anacostia Stream Valley Park (0.65 acres of the 114 acre Unit 2 section of the park). All PL options are proposed to cross the Long Branch Stream Valley

²¹ AA/DEIS, Op. Cit., page 4-3

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Park on an existing road and bridge. In all cases the impacted space is a small portion of the overall park (less than 3% according to Table 4.4-1. of the AA/DEIS). The most impacted park will be the 4.7 acre New Hampshire Estates Neighborhood Park where 0.14 acres or 2.89% of the total area is expected to be impacted. Mitigation strategies to offset impacts to all of these natural and park resources should be thoroughly evaluated during preliminary engineering.

1. **Trail Impacts**

- a. **Capital Crescent Trail Corridor status:** We support the finding that *“the interim Georgetown Branch Trail is not considered a Section 4(f) resource because the railroad right-of-way was purchased with the express intent of accommodating transit service in the future.”*²² As noted in the Section 4(f) Technical Report, the Montgomery County Council passed resolutions clarifying its intent in acquiring the public right of way for transportation purposes including both light rail and a trail on August 1, 1995 and July 30th, 1996.

While not a park in the legal sense, we believe the interim Georgetown Branch corridor must be treated sensitively with a park-like landscape along the trail and transit project.



Figure 5: Barcelona, Spain; Light Rail Line along bikeway with grass tracks and plenty of shade
http://farm1.static.flickr.com/7/12328091_00e6b8a7d3_o.jpg

²² AA/DEIS Preliminary Section 4(f) Evaluation Technical Report, page 3-20

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Melbourne, Australia; Decorative catenaries, grass and trees create an aesthetically pleasing transit corridor.

We concur with the Washington Area Bicyclist Association in its recommendation that the trail design standard be 12' with two 2' shoulders wherever this is feasible.

- b. **Broader Trail Network:** The Final EIS should more clearly underline the important contribution that trails make to the success of transit in the corridor. We support integration of the Purple Line with the:
 - 1. Completion of the Capital Crescent Trail into Silver Spring
 - 2. Completion of the Green Trail from Fenton Street to Sligo Creek Parkway.
 - 3. Completion of the terminal segment of the Metropolitan Branch trail where it interfaces with the Purple Line south of the Silver Spring Transit Center.
 - 4. Establishment of a cross-campus bikeway at the University of Maryland
- c. Conclusion: Parks and Parkland: We support the proposed "Measures to Minimize Harm" included in the Section 4(f) Evaluation Technical Report.²³
- f. **Section 4.6 - Visual Quality:** We believe the Final EIS should note the need to provide for the following:

²³ AA/DEIS 4(F) Technical Report, page 4-17

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1. Woodmont Plaza: A coherent design that meets transportation requirements of the project while creating a popular urban people-viewing plaza destination. We believe that movement of light rail trains can contribute to the success of this urban open space as is demonstrated at the cable car terminus in San Francisco and elsewhere. We firmly believe that the Purple Line will help energize the Woodmont Plaza area as light rail lines do throughout the world such as in Place Massena in Nice, France, shown below:



Figure 6: Nice, France. The Central Plaza – Place Massena was overrun with traffic before being completely renovated when the LRT line was completed in 2007 Photo by W. Smedley

2. The Capital Crescent Trail: Relandscaping of the trail between Bethesda and Silver Spring should be done in a manner that:
 - a. Is considerate of the light rail transportation requirements.
 - b. Provides screening for adjacent residents.
 - c. Provides wildlife habitat.
 - d. Creates a visually coherent and attractive corridor for recreational trail users.
 - e. Includes high quality lighting integrated with LRT catenaries.
 - f. Includes grass tracks for rails to reduce runoff, noise and heat load.
 - g. Includes trees to provide shade for trail users.

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Figure 7: Issaquah Valley Historic Trolley, Issaquah, WA

3. Fenton Village-Silver Spring Library Station: This station is closer to the traditional heart of downtown and historic Silver Spring and there is a tremendous opportunity for a visually stimulating space that contributes to the success of both projects.



Figures 8 and 9 Portland State University: Streetcar Line passing under the Student Center alongside an outdoor café
Source: Zimmer Gunsul Frasca Partnerships

4. Wayne Avenue: The at-grade option should include a new streetscape for the segment of Wayne between Fenton Street and Sligo Creek Parkway, including

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new lighting integrated with catenaries, crosswalks and sidewalks, decorative paving to differentiate the green trail from sidewalks, street trees, ornamental retaining walls where required, etc. Community input should be carefully sought to help alleviate any remaining neighborhood concerns about the at-grade alignment.

5. Campus Drive: Campus Drive should be provided with a similar makeover as Wayne Avenue.
6. The “M” traffic circle at the University of Maryland: The “M” is an important iconic feature of the UM campus, but its value has been degraded due to the excessive traffic congestion. The Purple Line provides an opportunity to better connect the “M” to pedestrian pathways and this improved connection should be a goal during preliminary engineering.
7. Rossborough Hall and Turner Hall (“the Dairy”) at the University of Maryland: The University has encouraged relocation of the Purple Line to Rossborough Lane where it passes between the two buildings before stopping adjacent to Ritchie Coliseum. It is important that this entire station area be treated with a high level of sensitivity to the historic campus environment.

g. Section 4.7 -Air Quality and Appendix: Air Quality Tech Report

The AA/DEIS concludes that there will be a slight overall air quality improvement for the build options over the no build ones. While this is put at about .07% overall²⁴, it seems likely that the improvement in air quality should be higher in certain congested sections of the service area should a light rail Purple Line replace diesel buses. This should be evaluated in locations such as downtown Silver Spring where bus and auto traffic is high.

The impact of the Purple Line may be greater if the transit improvement is coordinated with land use changes encouraging the synergy that exists along the Red Line between Friendship Heights and Farragut North. Many people live and work on this corridor without owning cars because of the functional diversity of land uses, and easy access to recreational and cultural facilities.

h. Section 4.8 - Noise and Vibration and Appendix: Noise and Vibration Technical Report

1. Noise: LRT design is proposed to include vehicle skirts that substantially minimize noise impacts – therefore no noise impacts are anticipated from LRT line operations.
2. We support inclusion of sound walls to mitigate noise impacts from LRT at the proposed Glenridge maintenance facility along Veteran’s Parkway. Baffles

²⁴ AA/DEIS – Table 4.7-4

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should also be used in areas where reverberation is likely to amplify noise impacts.

3. Wheel Squeal: This problem should be minimized through design and mitigated where necessary.
4. Vibration: The DEIS states that: *“There are a range of mitigation measures which can be adopted to effectively reduce or mitigate both line operation and construction related noise and vibration impacts”*²⁵ We support the use of LRT skirts and selective use of low sound walls to reduce noise below FTA impact limits.
5. Electromagnetic Interference (EMI): The University of Maryland is concerned about the impact of EMI on campus research facilities. Throughout the world, LRT lines operate in cities with major research institutions. MTA should more thoroughly analyze mitigation strategies as part of the final EIS.

i. Section 4.9 – Habitat and Wildlife and Appendix - Natural Resources Tech. Report.

The DEIS concludes that there is very little wildlife of significance along the Purple Line corridor, the landscape plan for the project should be developed in a manner that provides improved conditions for wildlife as well as an appropriate selection of plant species native to the State of Maryland.

j. Section 4.10 – Water Resources

The Purple Line must be designed in a manner that meets all applicable water quality codes and utilizes best practices for stormwater management.

We echo the testimony of Andy Fellows, Chesapeake Regional Director of Clean Water Action who stated in his testimony that:

The Purple Line will inspire re-development, which is important to restoring regional water quality in a number of ways: It takes advantage of existing water infrastructure, rather than requiring new pipelines and wastewater systems; it speeds the upgrade and repair of that existing water infrastructure; it leverages private sector dollars to share part of the cost of retrofit upgrade for storm water management (reducing flooding, wastewater pipe breaks, drinking water pipe breaks, reducing the quantity and velocity of the flow of storm water, which erodes banks and pollutes our streams in multiple ways. We are in the process of investing millions of dollars in restoring the Anacostia River and its tributaries here in Prince George’s County and in Montgomery County. The Purple Line, by spurring new investments in our communities, is a crucial part of that

²⁵ AA/DEIS; page 4-56

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*restoration. Similarly, it is a key part of the restoration of other tributaries of the Potomac River, such as Rock Creek.*²⁶

1. Use of grass tracks along the Georgetown Branch will reduce runoff, mitigating watershed impacts. Paving this trail for BRT would have a far greater negative impact.
2. Mitigation will be required for the small area of wetlands impacted under the M-LRT scenario. As noted in the Chesapeake Bay Foundation testimony:

*“Up to 1.4 acres of some wetlands impacts are possible (mostly due to bridging,) but such impacts are modest with a project of this scale, and can be mitigated. About a mile of in-line stream and 13-15 acres of floodplain impacts (mostly due to minor fills from additional road/transit-way support) are also possible. The project would need to assiduously protect against erosion with construction on certain soils that occur across the area.”*²⁷

- k. Section 4.12 Hazardous Materials: Table 4.12-3 of the AA/DEIS states that there are 107 properties of relatively high potential for concern with in the corridor. This is an opportunity to clean up some existing nuisance properties.²⁸
- l. Section 4.13 Safety and Security: We agree with the conclusion that pedestrian-transit conflicts are generally manageable along the Purple Line corridor. However, we want to make two points about this important issue.
 1. Safety conditions along the Capital Crescent Trail between Bethesda and Silver Spring will be significantly improved if the grade separations are completed as planned. The existing interim trail is very unsafe as is shown in the photograph below:

²⁶ Fellows, Andrew; Purple Line Testimony, November, 2008

²⁷ Girard, Jr., Alan; Testimony by the Chesapeake Bay Foundation Concerning the Purple Line Transit way Alternatives Analysis/Draft Environmental Impact Statement (11-18-08)

²⁸ AA/DEIS, page 4-83

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Figure 10: The dangerous Georgetown Branch Interim Trail at 16th St. and 2nd Avenue
Photo by Wayne Phyllaier

2. We do not believe the DEIS adequately evaluates the safety issues of the proposed Preinkert alignment in comparison to those of the Campus Drive alignment through the University of Maryland. If the Preinkert option will result in all buses being routed through the narrow gap between LeFrak Hall and the South Campus Dining Hall, we believe the safety challenges will be far greater than if this route included only the Purple Line. This should be clarified and considered in weighing the relative merits of the two alternatives.

6. COSTS AND FUNDING

a. 5.1 - Capital Costs

It is very helpful that MTA has done such a thorough cost evaluation. EnReview has observed that:

*“the data presented goes beyond that normally required at this stage of project development. The level of detail that is provided in the several hundred pages of attachments far exceeds what is required for selecting between alternatives at the AA/EIS level. However, the FTA is becoming more demanding on capital cost detail as projects move closer to implementation in order to avoid unexpected costs above budgets that are used for decision making.”*²⁹

EnReview goes on to make the general observation that:

²⁹ EnReview, p. 5

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“the features (cost categories) of rail alternatives have been defined more severely (higher resulting costs than cost related to the bus options).”³⁰

These cost projections should be reviewed more carefully in the Final EIS.

- b. Section 5.2 Operating Costs and Appendix – O&M Cost Estimate Technical Report
The EnReview reviewers have observed that:

“operating costs seem unusually high for the light rail alternative”.

EnReview speculates that, while MTA’s existing Baltimore LRT line is the *“most appropriate to use for modeling the cost of the Purple Line, there are anomalies in recent data that appear to be yielding trend results that are in variance with what the writer believes are likely results”*.³¹

We concur with EnReview’s conclusion that more favorable O&M predictions may be developed when a clearer operation plan is worked out during preliminary engineering. Nonetheless, EnReview concludes that:

“even with the values presented, this reviewer finds the LRT options to be significantly more attractive than the bus options.”³²

7. EVALUATION OF ALTERNATIVES

PLN believes the medium Light Rail Transit option is the best alternative in terms of effectiveness in meeting the project’s purpose and need.

There are many reasons for supporting the M-LRT option. These are summarized on the following three pages:

Why Medium LRT is the best Alternative

Light Rail Will Serve More Riders and Divert More Autos than BRT

If the Purple Line is built according to Montgomery County’s Master Plan, using a light rail system along the Georgetown Branch Rail right-of-way, it is estimated that up to **68,000 trips per day** would be taken on quiet, comfortable light rail trains instead of our congested roadways. **Projected ridership of the**

³⁰ EnReview, p.6

³¹ IBID, p. 10

³² IBID, p. 11

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various alternatives is outlined in the following table. Light rail has higher ridership and takes more cars off the road than BRT.

BUS RAPID TRANSIT (BRT)	Ridership	Diverted from Auto Use
Low Investment BRT	40,000	11,400
Medium Investment BRT – JBR (SSE)	50,000	14,500
Medium Investment BRT to Bethesda	51,800	15,300
Medium Investment BRT – via Georgetown Branch to Bethesda, then Woodmont Ave to Medical Center	58,000	16,100
High Investment BRT	58,900	17,700
LIGHT RAIL (LRT)	Ridership	Diverted from Auto Use
Low Investment LRT	59,300	18,200
Medium Investment LRT	62,600	19,200
High Investment LRT	68,100	20,500

Light Rail is Much Faster than BRT – Sample Travel Times

All of the light rail options result in travel times between Bethesda and Silver Spring or College Park that are nearly twice as fast as the bus rapid transit (BRT) alternative developed by Sam Schwartz Engineering (SSE) for the Town of Chevy Chase.

Estimated Travel Times: Bethesda to Silver Spring or College Park

Bethesda to Silver Spring

- **SLOWEST:** Medium investment BRT via Jones Bridge Rd (SSE).....20 min.
- Medium investment BRT via Georgetown Branch.....19 min.
- Low investment Light Rail Transit (LRT).....12 min.
 - Medium investment LRT.....9 min.
 - **FASTEST:** Higher investment LRT.....9 min.

Bethesda to College Park

- **SLOWEST:** Medium investment BRT via Jones Bridge Rd (SSE).....50 min.
- Medium investment BRT via Georgetown Branch.....49 min.
 - Low investment LRT.....38 min.
 - Medium investment LRT.....34 min.
 - **FASTEST:** Higher investment LRT.....30 min.

Travel times are based on the Purple Line Alternative Analysis (averaged for the round trip) and SSE Jones Bridge Road alternative.

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LRT Has Greater Capacity that Better Serves Long Term Needs

When looking out beyond the 2030 forecast year, the BRT alternatives would reach their more effective capacity limits sooner than the LRT alternatives. The Purple Line 2030 ridership forecasts show a level of ridership higher than most BRT and LRT systems in the United States.

- While the LRT and BRT alternatives have six-minute headways for the length of the Purple Line corridor, the operating & maintenance costs for the BRT alternatives assume additional "tripper" service inserted between Silver Spring and Bethesda -- a minimum of 7-8 additional runs per hour. That would bring the gaps between the buses to between 3 and 4 minutes. On the Medium and High BRT segments in Bethesda that operate on street (Pearl Street to the Bethesda Metro Station - North and South Entrance) buses at some point in the future would start "stacking up" at the traffic signals with cycles of 90 or more seconds and limiting the practical upper service capacity level of the BRT alternatives. LRT by virtue of its higher train capacity and operating in "a practically exclusive" operating environment would have a higher upper limit in service capacity.
- Beyond 2030 Medium and High BRT could be expected to reach that capacity threshold with the growth in ridership beyond 2030 or even sooner if higher than forecasted ridership levels. LRT has the capacity to absorb that growth for a longer time horizon. With higher gas prices, Purple Line ridership could be even higher than forecasted.
- The operating plan for these estimates were based on using transit car capacity estimates closer to bus manufacturers' estimates rather than experience in Washington DC region. With heavy Metrorail ridership, WMATA has found that "choice" riders require more comfortable, less packed conditions. Using local experience may mean that buses run every two minutes. LRT trains have three times the capacity so a three car LRT train every six minutes has the same capacity as a 60 foot bus every two minutes.

Other Reasons Why LRT is better than BRT for the Purple Line

While Bus Rapid Transit (BRT) is desirable for many potential transitways, it is not the preferred solution for the Purple Line.

- Between Silver Spring and Bethesda, BRT would require 20-25' of paved roadway (plus shoulders) to be added for bus lanes where no road exists today. This section would be using some portion of the abandoned Georgetown Branch Railroad right-of-way even in the Jones Bridge Busway option. The MTA has proposed "grass tracks" for the LRT solution while similar solutions for bus lanes are rare.
- BRT would add steerable buses next to the Capital Crescent Trail with the buses subject to driver error or slippery conditions. And all buses would have some local exhaust emissions and runoff whether they are diesel, natural gas or hybrid.
- The poster child for BRT in North America is Ottawa, Canada. Recently that city has decided to expand their transit system by LRT lines and is seeking funding to do that.
- Light Rail has been specified on the County's Master Plan since 1990 when the Georgetown Branch Master Plan was approved. That process rejected buses on a busway between Bethesda and Silver Spring. That Master Plan includes the following statement: *"In the event future*

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consideration is given to implementing additional double track sections, the existing right-of-way is generally sufficient with appropriate structural treatment to accommodate the necessary typical 56-foot trolley/trail cross section (see Figure 4), except along the Metropolitan Branch section from Talbot Avenue to Silver Spring.³³

Major Advantages of Light Rail Compared to the Jones Bridge BRT Proposal

- **Light Rail Provides Unimpeded Travel Between Silver Spring and Bethesda and Accommodates Future Growth:** LRT would provide a direct, unimpeded connection between the Red Line Stations at the Silver Spring and Bethesda Central Business Districts (CBDs). The BRT on Jones Bridge Road would be delayed by turning cars and intersection delays at Connecticut and Wisconsin Avenue and results in a longer routing connecting the larger markets at the CBDs. This alternative would build in capacity constraints that would worsen over time as traffic continues to increase. The ability to react should ridership exceed predictions would be severely limited.
- **BRT Along JBR Means Eminent Domain, Light Rail Does Not:** Accommodating SSE's dedicated BRT lanes along Jones Bridge Road requires taking of private property at intersections and station areas to accommodate the necessary width. Or, policy decisions would have to be made to ban automobiles on existing traffic lanes and allow only buses within the existing right of way. In contrast, light rail and the trail can be accommodated in the available right of way all the way to the entrance to Bethesda Station.
- **Light Rail Means 1.8 Million Fewer Auto Trips a Year Than the Jones Bridge Road BRT:** LRT would remove approximately 4,000 - 6,000 more trips per day than the JBR BRT alternative advocated by SSE. This represents an annual reduction of over 1,800,000 auto trips per year. Light rail will result in 2,500,000 more user benefit hours than the SSE alternative, according to MTA.

Economic Development and Light Rail

The Purple Line will not just improve our local transportation network, it also provides key regional connections that add to Montgomery County's connectivity with other key economic resources throughout the region (University of Maryland, Greenbelt/MARC, New Carrollton station/Amtrak) without sitting for hours on the Beltway. It pulls together a regional network of destinations that would be accessible from many points in Montgomery County via an efficient, high-quality transit service. This adds significantly to our competitiveness and attractiveness as a business location, as well as being highly appealing to potential knowledge workers who live beyond the County's borders but who could be brought within a reliable 45 minute commuting radius to many jobs by a light-rail Purple Line. Think about a future where leading documentary film makers, and related communications industry leaders, could leave their offices in or around the Discovery headquarters (leave their car at home), hop on the Purple Line for a quick trip from Silver Spring to New Carrollton to connect to a less-than-three-hour trip to Manhattan on the Amtrak Adela. That is how to make Silver Spring thrive as the number-two communications industry center on the east coast.

According to the new DEIS, light-rail options outperform BRT options across the board from a transportation standpoint, and of particular note are the significant differences in travel times. LRT

³³ Montgomery County, Maryland; Georgetown Branch Approved Master Plan, 1990, page 49

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vastly outperforms BRT on this critical performance measure: it is not even close. Light rail creates a vastly larger area that would be within the "magic" 45-minute commute window for major job centers. BRT options do not significantly increase this area. Research shows if employees have to commute more than 45 minutes each way, employers simply cannot retain them for more than 6 months on average.

The Purple Line will contribute greatly to future economic development, increased property values, and the re-development of underutilized areas and hard-hit communities, particularly around the planned station areas. The economic development impacts of a light rail option would surpass what you could achieve with a bus-rapid-transit system. Specific locations that would be most positively impacted would be consistent with smart growth goals, master plans, etc. This will significantly boost the assessable tax base, which at a time of grave economic crisis, ought to be everyone's overriding priority. This adds many millions of dollars in future tax revenue to the Counties and State, for years to come without raising tax rates.

8. PUBLIC OUTREACH AND COORDINATION TECHNICAL REPORT

EnReview Consulting has reviewed the AA/DEIS for consistency with FTA and CEQ guidelines and found the document to be consistent with U.S. Department of Transportation regulations as codified in the Code of Federal Regulations at 7771 Part 123 and in the CEQ's scoping Memorandum guidance.³⁴ EnReview observes that:

*"The regulatory requirements for scoping activities were surpassed" ... "Public Outreach for the project exceeded the requirements of NEPA and the preparation of EIS documents" ... "MTA was responsive to the comments obtained during the scoping process. Alternatives that were not considered reasonable were documented as such and alternatives that deserved further study were added to the alternatives analysis."*³⁵

9. CONCLUSION:

Purple Line NOW! believes that the State of Maryland has the opportunity to construct the most successful Light Rail Transit line in the country if the State moves forward with the Purple Line connecting Montgomery and Prince George's Counties. We strongly endorse the M-LRT alternative with the recommended modifications included in this document. This alternative:

- a. Has greater capacity than BRT.
- b. Will better help revitalize communities.
- c. Is quieter and less polluting than buses or automobiles.
- d. Is cheaper and more flexible than Metrorail.
- e. Is more compatible with a hiker-biker trail than buses.

We urge the Secretary and Governor to request approved by FTA for moving forward with preliminary engineering of the Medium Light Rail Transit option for the Purple Line on the most aggressive timeline.

³⁴ EnReview, page 2

³⁵ EnReview, page 3



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December 14, 2008

Mr. John Porcari, Secretary
Maryland Department of Transportation
7201 Corporate Center Dr. P.O Box 548
Hanover, Md. 21706

Dear Mr. Porcari:

I am writing to share with you a report, prepared by independent consultant, EnReview Consulting, on the Purple Line DEIS. This report confirms our impression that the DEIS is a well written product that is compliant with the applicable National Environmental Policy Act statutes in every way.

EnReview Consulting is a nationally known firm with experience in evaluating and Drafting Environmental Impact Statements. The firm's principle, Sharyn C. LaCombe worked with Maurice M. Carter on the review. The resumes of both Ms. LaCombe and Mr. Carter are included in the first page of the report.

The goal of this study was to evaluate the completeness of the DEIS by comparing it to other similar reports. A secondary goal was to make some judgments about the merits of the options presented in the DEIS and recommendations for the next phase.

The conclusion of this report is that the Medium Light Rail option of the Purple Line "is a very good project". It includes other significant findings. Most importantly, this review finds that the "benefits of the project are conservatively estimated while the costs and impacts are based on a worst-case scenario and therefore somewhat overstated."

We will submit this report to Ms. Ratcliff to enter into the DEIS record.

Sincerely,


Webb L. Smedley

Attachment

cc: Mike Madden



Review of Purple Line AA/Draft EIS

EnReview Consulting, LLC, has the pleasure of submitting this review of the Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/Draft EIS). EnReview Consulting, LLC, provides transit planning and EIS processing to clients nationwide that are seeking FTA New Starts funding. EnReview Consulting provides specialty EIS process management aimed at expediting the environmental review process, meeting the ever-changing New Start and FTA requirements, providing quality documents, and putting the client at minimal risk for challenges by project opponents.

The Review for this project has been completed by Sharyn LaCombe and Maurice Carter. The firm's Principal, Ms. Sharyn LaCombe, AICP, is a NEPA (National Environmental Policy Act) Process Manager has been a leader on several EIS teams that have advanced into the next phase of FTA project development, have received full-funding agreements, and are either in construction or operational: including, Houston LRT, Newark Elizabeth Rail Link, the Charlotte South Corridor LRT, the Norfolk LRT project and the Cleveland Euclid Corridor BRT. Ms. LaCombe is a professional urban planner certified by the American Institute of Certified Planners and was previously employed by the City of Houston and Houston METRO, BRW (now owned by URS Corporation), and the Parsons Transportation Group before founding EnReview Consulting, LLC, in 2006.

Mr. Carter brings over 40 years of experience in transit planning, including serving as a former Technical Advisor for the Maryland Governor's Mass Transit Steering Committee and Project Engineer with the Maryland MTA. He has worked for a number of transit authorities during the feasibility, planning, and operations of many bus and rail operations in cities such as San Diego, Dallas, Sacramento, Dallas, Portland, Miami, San Jose, Saint Louis and Baltimore. He was a former Vice President with Parsons Transportation Group and operated his own transit consulting firm for over 12 years. He specializes in the alternatives analysis phase of project development and efficient transit operations for bus and rail programs.

Summary of Findings

The Purple Line Alternatives Analysis/Draft EIS circulated by the MTA on October 17, 2008 follows the Federal Transit Administration's (FTA) guidance for preparing such documents. All technical reports have also been completed using FTA Guidance and the President's Council on Environmental Quality Guidance for

preparing documents in accordance with the National Environmental Policy Act of 1969.

In general, the review finds that ***the benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated.*** The disclosure of data in this manner is a standard professional practice in preparing NEPA documentation and reduces the risk of potential legal challenges of such documentation.

Minor recommendations are made for subsequent phases of project development. Specific comments on the following reports are provided in the remainder of this memorandum:

- Review of AA/Draft EIS Scoping and Project Initiation Materials
- Review of AA/Draft EIS Methodology Reports
- Review of Alternatives Definition and Evaluation Report
- Review of AA/Draft EIS Document

Review of AA/Draft EIS Scoping and Project Initiation Materials

The Scoping Process and Project Initiation Materials were contained in the *Public Outreach Coordination Technical Report*. Appendix A of this technical report contains the Bi-County Transitway Scoping Process Report. This report was reviewed for consistency with the Federal Transit Administration (FTA) and the President's Council on Environmental Quality (CEQ) guidance on conducting scoping for the project. It was found to be consistent with U.S. Department of Transportation regulation as codified in the Code of Federal Regulations at 771 Part 123 and in the CEQ's Scoping Memorandum guidance. The following observations were made of the Scoping Process Report:

- scoping activities notices were well documented in the report (i.e. federal register notice, notices to interested and affected parties, agency coordination materials, outreach to non-English speaking communities, etc.). The required notification was provided to interested and affected parties within the corridor. Several opportunities were provided to obtain public input and the regulatory requirements for scoping activities were surpassed.
- alternatives to be studied in the EIS were announced to the public during scoping. The geographic scope of the study was identified as well as the modes to be included in the AA/EIS. Comments received during the Scoping process were documented and addressed. MTA was responsive to the comments obtained during the scoping process. Alternatives that

were not considered reasonable were documented as such and alternatives that deserved further study were added to the alternatives analysis.

- Environmental concerns raised during the scoping process were addressed in the AA/EIS. Specifically, security concerns were raised during scoping and were addressed in Section 6.4.13 of the Draft EIS.

Review of AA/Draft EIS Methodology Reports

A methodology report for the AA/Draft EIS was not prepared. Instead the methodologies were listed in each of the technical reports which accompanied the AA/DEIS. Documenting the methodologies for an EIS is a requirement that was codified with the passage of SAFETEA-LU. This project was initiated after SAFETEA-LU and therefore was not required to complete a methodology report. Specific comments on methodologies used in each technical report are identified below in Table 1.

Technical Report	Comments
Air Quality	EPA and USDOT methods were used to conduct the analysis. The project was found to be in conformity with the SIP and TIP. The technical analysis and the models used to conduct the analysis are the usual and customary methods.
Archaeology	The Area of Potential Effects was developed in coordination with MHT. A very conservative 250 feet swatch from centerline used for the APE to be refined upon selection of an LPA. While consulting parties are identified in the Draft EIS, the coordination with consulting parties was referenced to apply to cultural resources of which archaeology is. Specific outreach to archaeology consulting parties is not documented in Archaeology Technical Report or detailed in the AA/Draft EIS. The paragraph describing the consultation activities that is described in the Architectural History Technical Report should be added to the Archaeology Technical Report in order to document consultation with consulting parties was also conducted for archaeology.
Architectural History	Public Involvement activities identified cultural resources as a topic of discussion during scoping and open house meetings. Consulting parties and public outreach for compliance with Section 106 are described in this technical report. It might be useful to add public involvement notices and letters to consulting parties as an appendix to the Architectural History Technical Report. A conservative Area of Potential Effects of 500 feet was used. The technical report and the AA/DEIS does not yet include formal Determinations of Eligibility which is normal for this stage of project development and allowable under the Section 106 regulations. It is possible that some resources identified in these reports as potentially eligible are eliminated before PE/FEIS is complete due to building

	alterations, demolitions, or SHPO disagreement with the recommendations or eligibility. The data presented is sufficient for AA/DEIS planning activities and the comparison of impacts amongst alternatives as the worst case scenario is assumed.
Technical Report	Comments
Capital Costs	<p>FTA's Standard Cost Categories for cost estimating were used. Data was entered into a cost stream format so that the evaluation of the costs of various segments can be pulled out. Conservative contingencies were used to assess unknown conditions such as hazardous materials mitigation or disposal. Standard percentages for professional services were used. Local standard cost data was used to reflect market conditions. Contingencies seem appropriate for conceptual level design.</p> <p>Alternatives Analysis studies often include an order-of-magnitude cost estimate for project alternatives. The cost estimate technical report details the proposed cost of each alternative based on line item entries. The data presented goes beyond that normally required at this stage of project development. The level of detail that is provided in the several hundred pages of attachment far exceeds what is required for selecting between alternatives at the AA/EIS level. However, the FTA is becoming more demanding on capital cost detail as projects move closer to implementation in order to avoid unexpected costs above budgets that are used for decision making.</p> <p>A general comment that may be misleading is the category of "Contingency" explained in Section 4.1. A better term for the add-on amounts is "Design Allowance." It is money that by professional experience will be used within the estimate as design matures from the planning level to the preparation of design documents. It is not money that may be used for unidentified purposes such as adding an arts-in-transit program. The explanation is correct but some readers may get an incorrect impression of what the allowances will be used for.</p> <p>The reviewers are firm believers that, even at the planning</p>

	<p>level, there should be an Operating Plan Document. Without it, the application of capital cost (and operating cost) methodology must be applied using assumptions which aren't transparent and may rely too heavily on computer model output. However, within the context of selecting between alternatives there seems to be sufficient information from which conclusions may be drawn. A general observation is the features (cost categories) of rail alternatives have been defined more severely (higher resulting cost) than costs related to the bus options.</p>
Technical Report	Comments
Capital Costs (cont.)	<p>Section 4.2.6 provides an excellent discussion of how the many components of capital cost may be annualized to account for varying life cycles of the components. The classic example is the life of a bus at 12 years compared to a railcar with a life of, at least, 30 years. The net effect is the capital cost of buses needs to be multiplied by, at least, 2.5 compared to the cost of LRVs in order to gain capital cost equilibrium between the alternatives. However, the capital cost summary that is provided in Table 6-1 does not appear to have applied the annualization impact. If that is the case, the result is a display of costs, side-by-side, that may mislead the reader in thinking, for example, the money required to purchase buses is what is shown when, in fact, that cost is only good for the first 12 years.</p> <p>There are reservations after reviewing the information in Table 6-1. There does not appear to be information that would explain the BRT fleet ever being smaller than the LRT fleet (Railcars accommodate more people) and there does not appear to be an explanation for the railcar fleet staying unchanged (44 vehicles) for all three alternatives while the travel time decreases as the investment increases. That said, a quick review of the ridership estimate indicates the fleet can accommodate the demand. It is more difficult to determine how the fleet may change between the options since that information is driven by the network models. Again, the purpose of the comments is to alert readers that the LRT options relative to the BRT options may be being presented in a way that is</p>

	<p>not as favorable to the LRT options as it may actually be.</p> <p>The data for weather conditions listed on page 4-1 should be confirmed that the intent was that MD specific conditions were used in the cost assumptions.</p>
Energy	<p>Energy use for each Build Alternative was used by identified the direct BTU consumption for each alternative. This methodology is consistent with FTA procedures. The Technical report properly evaluates the direct and indirect impacts of the Build Alternatives.</p>

Technical Report	Comments
Geotechnical	Geotechnical investigations are usually limited to research of soil and subsurface conditions during an AA/EIS level document. Given the consideration of tunnel sections, geotechnical investigation, and specifically, geotechnical borings were taken near tunnel sections of the alternative alignments. These investigations provided greater accuracy with regards to the location of the tunnels, portal locations, and construction methods than is normally conducted at this phase of study. The work performed was thorough and helps to provide sufficient detail needed for the design of the alternatives so they could proper evaluated from a design and cost estimating stand point.
Hazardous Materials	An initial site assessment was performed and is the appropriate level of assessment for this phase of study. The data used is not more than three years old. A site reconnaissance was performed. Data presented is usual and customary for this level of environmental document.
Natural Resources	All technical areas have been properly addressed using the latest guidelines and regulations. Impacts have been overstated and counted for the alternative alignments but also the design options. This overstating of impacts is consistent with NEPA worst-case scenarios but this nuance may not be recognized by some readers. The relative impacts amongst alternatives are significantly different. Efforts to reduce impacts have been employed. Given the context of the corridor and the extent of natural resources, it is impressive that fewer impacts would not result from the project.
Noise and Vibration	The FTA Guidance for noise and vibration was used to conduct a general assessment as required. The impacts were properly assessed using this guidance. The assumptions in the analysis were conservative.

Technical Report	Comments
Operations and Maintenance	<p>Operating Costs seem unusually high for the light rail alternative. Intuitively, light rail should have some additional costs (labor is generally higher) but there should be some benefit by being able to carry more passengers in one trip since rail cars can be connected in 2 and 3 car configurations. In general, the operating costs for light rail seem disproportionately high in comparison to BRT.</p> <p>While the reviewers agrees that the MTA LRT system is the most appropriate to use for modeling the cost of the Purple Line, there are many anomalies in the recent data that appear to be yielding trend results that are in variance with what the writer believes are likely results. The report points to the difficulties of modeling using the years where LRT service was greatly curtailed for items like the double tracking work. Additionally, the cost allocation between modes that is performed by the MTA is subject to internal interpretations and requirements of the enabling legislation with respect to items such as farebox recovery for the bus services. The National Transit Database (NTD) now contains year 2006 information that may shed additional light on the cost models. It appears that the document preparer has assumed the most unfavorable cost conditions for the LRT alternatives relative to the bus alternatives. That is to say there can be reasonable confidence in the bus numbers but, in each instance, it appears the potential error within the LRT values is cumulative and unfavorable. While the full set of matrices isn't available to see the impact to specific cost elements, it appears that the LRT O&M cost is more that 10% greater that may be expected if the Purple Line were in operation in the fall of 2007.</p> <p>There is discussion regarding the relative increases in employee fringe costs between rail and bus employees at the MTA – about 160% and 37%, respectively. Labor cost is an extremely significant contributor to the model. Historically, senior staff elect to work rail service which would cause more cost for items such as vacation coverage but the variance between the numbers can only</p>

	<p>be attributed to bookkeeping and not to contract conditions. It's not clear if fringe adjustments were made to the cost estimates based on the summary data that was available for review. However, if an adjustment was made, it, too, may be compounding and causing LRT costs that are higher than what</p>
Technical Report	Comments
Operations and Maintenance (cont.)	<p>were expected.</p> <p>It is important to note that a comparison of the bus allocation modeling information doesn't indicate the anomalies found in the LRT data. The cost information which is presented is very important in terms of absolute values but it may be more important in a relative sense between the alternative modes. Therefore, an equal level of confidence is needed for bus and rail related costs. Even with the values presented, this reviewer finds the LRT options to be significantly more attractive than the bus options.</p>
Public Outreach	<p>Public Outreach for the project exceeded the requirements of NEPA and the preparation of EIS documents. Advertisements were far reaching and provided sufficient notice for attendees. Outreach materials were provided in Spanish and Chinese. Specific outreach activities were employed to identify and engage the transit dependent and environmental justice communities. Several rounds of public meetings/open houses were held throughout the study period. Individual coordination meetings were held with interested and affected parties throughout the corridor. The outreach efforts are sufficiently documented in the public outreach technical report.</p>
Section 4(f) Evaluation	<p>Section 4(f) Evaluation Technical Report used the appropriate definitions detailed in the regulations for identifying 4(f) uses. The identification of the Interim Georgetown trail for transportation purposes and its exclusion from 4(f) is properly identified and documented. The evaluation properly applies the de minimus finding for properties not adversely affected by the project. At this point, project impacts on 4(f) resources are conservatively stated. Fewer impacts resulting from the Build Alternative</p>

	are likely when the area of construction limits and “use” are narrowed.
Socio-Economic Conditions	Terminology for property acquisitions and displacements is not consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act that governs the purchase of real estate for federal funded projects. The report identifies a displacement as a “taking”. As the property owners are going to be compensated for their property based on fair market value, it would not result in a “taking” which is a legal term that means a governmental body required private land to be used for public purpose without compensation. Secondly, leaseholders (business or residential) can also be “displaced” even though their personal
Socio-Economic Conditions (cont.)	land is not acquired for the project. All displaced persons (owners and renters) are eligible for relocation assistance under the program. The report does properly and most importantly equally assess the impacts of displaces, either renters or owners, so the results that are presented relative to the number of displacements is correctly identified.
Traffic	The traffic impact assessment used forecasted travel data from the regional council of governments. An appropriate traffic growth rate factor was used to forecast future No-Build/Build Conditions. The analysis considers conflicts to other modes of transportation and is a complete representation of projected impacts.
Travel Demand	<p>Ridership projections were forecasted using the methods set forth by the Federal Transit Administration. Consideration was given to BRAC changes in employment and population in the corridor. The ridership is conservatively forecast using the travel demand forecasting techniques and constants required by the FTA.</p> <p>It is the reviewers' opinion that the ridership of all modes is probably understated given the conservative methods and travel model techniques employed across the country. Several transit projects have opened in the last 5 years and have seen much higher ridership than initially forecasted. Examples include: Houston LRT, Minneapolis LRT and the Charlotte Light Rail. As an example, the Charlotte LRT forecasts for ridership were 17,900 for their 25-year planning horizon. Eight months after opening, the Charlotte</p>

	LRT ridership was 16,936 riders, just under the 25 year horizon with not even a year of revenue service in place.
Conceptual Plans	The conceptual plans were reviewed for consistency with the alternatives presented in the AA/DEIS and were found to be consistent. EnReview Consulting, LLC is a transportation/environmental planning firm and therefore is not qualified to assess the sufficiency of engineering plans and drawings.

Review of Definition of Alternatives Technical Report and Evaluation

The Definition of Alternatives systematically documents the alternatives development and definition process from the initial alternative identified in the scoping process to those presented the AA/Draft EIS. The document addresses and sets aside alternatives that are no longer in consideration. Alternatives were developed from a strong history of transportation/transit planning. The alternatives presented in the AA/Draft EIS are responsive to concerns raised throughout the AA process as documented in the public outreach technical report.

The documents have defined the transport need within the corridor consistent with adopted land use and transport plans. The alternatives considered have exceeded the detail requirements required to reach decisions by varying the bus and fixed guideway alternatives as compared to the base constrained adopted plan and the potential Transportation System Management (TSM).

Further, in response to the Town of Chevy Chase, the MTA has evaluated additional options for the Bus alternatives, using the Jones Bridge Road option, to directly serve the BRAC facilities based on base realignment plans. The results of the evaluation by the MTA appear to fairly treat the medical facilities as well as the other employment centers that would have the opportunity to use the Purple Line. It is the reviewers' opinion that, while the MTA has considered all potential users, the Town of Chevy Chase's consultant wishes to have a primary emphasis placed on the BRAC related facilities without considering the overall impacts to the Purple Line service area. A similar view is expressed in the Town's consultant's review regarding directionality of transferring passengers between the Purple Line and METRO. This is a very important point and it may be brought up again. There is always the possibility that, at the micro level, a specific element may be improved. If only that element is presented, it can have the impact of diverting attention to the larger picture. The big-picture result may be detrimental to the overall project. With any project of this magnitude there are going to be trade-offs. The Jones Bridge Road option does not appear to

warrant additional consideration beyond what is in the documents. Sufficient information is available to allow for a decision among the alternatives.

Conclusion: The documents have addressed reasonable alternatives for the corridor as a whole and matched the alternatives to its purpose and the transport need they are addressing. While further detail refinements will and should be considered as a project moves through subsequent planning and engineering phases, there is ample information available to use to select a project to pursue. Further, it appears that the MTA has taken proper care to address the specific concerns of the Town of Chevy Chase in a regional and corridor context and its findings fairly reflect the potential impact to the corridor conditions.

Review of AA/Draft EIS Document

The Purple Line Alternatives Analysis/Draft EIS circulated by the MTA on October 17, 2008 follows the Federal Transit Administration's (FTA) guidance for preparing such documents. All technical reports have also been completed using FTA Guidance and the President's Council on Environmental Quality Guidance for preparing documents in accordance with the National Environmental Policy Act of 1969.

Throughout the document, the regulations and procedures are described. The EIS has addressed all federal regulation changes in the AA/EIS document. Methods and techniques for assessing alternatives, identifying project corridor conditions, and assessing environmental impacts are consistent with FTA guidance for preparing Alternatives Analysis, FTA New Start Assessments and NEPA documentation at the EIS level in accordance with all required USDOT guidance and regulations. The EIS process was initiated prior to the implementation of SAFETEA-LU; therefore, the new environmental provisions are not required to be addressed in this EIS document.

In general, the review finds that the benefits of the project are conservatively estimated while the costs and impacts of the project are based on a worst-case scenario and therefore somewhat overstated. The disclosure of data in this manner is a standard professional practice in preparing NEPA documentation and reduces the risk of potential legal challenges of such documentation. It is important to caution that the general public and the news media might be overly concerned by project impacts than they should due to these conservative methods. There is recognition of this in the document and the explanation that the impacts of an alignment are summarized in their entirety including design options. The reviewers recommend future documents detail out

between the design options these impacts so that the impacts can be more accurately identified and less overstated. Additionally, the study areas for the review of the alternatives are conservatively wide due to the conceptual level of design of the current project phase. Assumptions related to the construction footprint beyond 10'-15' on each side of the outer edges of the construction limits also allows for an overstating of impacts. Once more detailed design is developed these limits can be narrowed and the site specific impacts of the alternatives can more readily be identified.

The consolidation of the east and west study segments into one document was a very well thought out consideration on behalf of the MTA so that the full impacts of the line could be assessed at one time and not segmented into individual analysis which could have understated the impacts in the entirety. This action could avoid environmental documentation challenges that critics may have tried to claim improper segmentation of the proposed project. The project as presented has logical termini at the METRO stations and connections to existing transit services. Given the full assessment of impacts from end to end, the selection of a minimal operating segment could be made without fear of properly assessing the impacts of the full proposal.

The document:

- details the purpose and need for the project in a clear and concise manner using supporting data derived from the transportation problem to be solved by a proposed investment;
- details the prior planning for transit in the corridor, the alternatives that have been studied, set aside and carried forward for further examination;
- identifies the traffic and transportation impacts associated with the No-Build, TSM, and Build alternatives;
- presents a worst-case scenario assessment of the potential short and long-term social, economic and environmental impacts; and,
- provides the evaluation framework, the FTA evaluation procedures and a technical evaluation assessment for each of the alternatives.

The AA/Draft EIS List of Preparers documents individuals well experienced in the transit industry and by personnel who are familiar with USDOT Regulations and most importantly, FTA guidance and procedures. The lead person on the PB America's Consulting Team for the MTA's consulting team is well respected for his expertise and it is evident in these documents. Further, the reviewers have worked directly with the lead person on the RKK engineering team and have the highest regard for his work as well as his vision of addressing what is required, in an engineering sense, to serve the identified travel needs.

The AA/Draft EIS has defined the transport need within the corridor consistent with adopted land use and transport plans. The alternatives considered have exceeded the detail requirements required to reach decisions by varying the bus and fixed guideway alternatives as compared to the base constrained adopted plan and the potential Transportation Management System (TSM).

Further, in response to the Town of Chevy Chase, the MTA has evaluated additional options for the Bus alternatives, using the Jones Bridge Road option, to directly serve the BRAC facilities based on base realignment plans. The results of the evaluation by the MTA appear to fairly treat the medical facilities as well as the other employment centers that would have the opportunity to use the Purple Line. It is this reviewer's opinion that, while the MTA has considered all potential users, the Town of Chevy Chase's consultant wishes to have a primary emphasis placed on the BRAC related facilities without considering the overall impacts to the Purple Line service area. A similar view is expressed in the Town's consultant's review regarding directionality of transferring passengers between the Purple Line and METRO. This is a very important point and it may be brought up again. There is always the possibility that, at the micro level, a specific element may be improved. If only that element is presented, it can have the impact of diverting attention to the larger picture. The big-picture result may be detrimental to the overall project. With any project of this magnitude there are going to be trade-offs. The Jones Bridge Road option does not appear to warrant additional consideration beyond what is in the documents. Sufficient information is available to allow for a decision among the alternatives.

The required public circulation for a Draft EIS is 45-days with a public hearing held sometime during that period. The MTA and FTA have doubled that period to allow for sufficient review of the document by the interested and affected parties and agencies with jurisdiction. Illustrating again how the MTA has exceeded federal requirements.

In conclusion, the documents have addressed reasonable alternatives for the corridor as a whole and matched the alternatives to its purpose and the transport need they are addressing. While further detail refinements will and should be considered as a project moves through subsequent planning and engineering phases, there is ample information available to use to select a Build Alternative to pursue. Further, it appears that the MTA has taken proper care to address the specific concerns of the Town of Chevy Chase in a regional and corridor context and its findings fairly reflect the potential impact to the corridor conditions. The full set of documents (technical reports and AA/DEIS) are very

complete and technically sound in terms of providing a clear picture of the project and its impacts to the communities and transport within the corridor.

Recommendations

The responsibility of the technical staff, in preparing solutions to the transport need, is to expend project capital resources that are required to solve the transport need in a safe and community conscious manner. It is the responsibility and prerogative of the community to add capital features to the project which may enhance the project to meet other community goals.

Where technically possible, consistent with overall community development plans, rail transit is best placed on the surface to be convenient to users and to become an integral part of the community. If it is not technically feasible to construct the line on the surface, the second choice would be to elevate sections to avoid technical problems. And, the least desirable choice is to place facilities in a subway. Transit is no different in this context than pedestrian facilities, auto facilities and recreational facilities. A classic comparison relates to pedestrians. The last choice would be to place pedestrians in a tunnel underpass.

An overall review of the documents suggests that the Medium LRT investment satisfies the need statement best although some features of the High LRT option may be added based on community preferences. The station at Fenton Street appears to be warranted in order to meet travel needs.

Capital expense may, sometimes, be avoided through operating considerations. For example, if noise levels are very near acceptable levels the noise may be brought into agreement with those levels by operating at a slower speed through the sensitive area.

During the next project phases, there should be a concerted effort made toward reducing items from the capital program that may be avoided as long as the impact to the system is minimal.

While it may cause additional work during the later project phases, it is permissible to carry minor alignments (horizontal and vertical) into the preliminary engineering phase where more information may be available for the technical staff and residents that will allow all to select options that will make the project the best it can be for the community.

Overall, the reviewers' would select the Medium LRT Option as the base condition to work from as the Preferred Alternative. The reasons are several:

- It is a very good project.
- While satisfying the project purpose, it more closely aligns to the reviewers' philosophy of the responsibility assigned to technical staff and a belief about what is best for the transit rider and the community as a whole.
- Any features that may be desirable from the viewpoint of the community may be identified with the recommendation that they be carried into the next phase of work.
- There are specific features of the project that are important to this reviewers that are recommended for future work phases:
 - Keep a station at Fenton Street. (Preferably an at-grade station.)
 - Keep the alignment along the trail. It is not only the best route to get to the west end of the project from Silver Spring but the uses are compatible and can be designed to be safe and pleasant.
 - Keep the alignment through the University of Maryland and, if possible, along Campus Drive. It's good for the university and its development plan and it is especially good for the students – on-campus residents and commuters.
 - Eliminate the added costs of tunneling under Sligo Park to reduce what are only minimal impacts and instead use some of those dollars towards mitigating the impact to the park.
- At least for the selected option, insist that an Operating Plan be prepared immediately after the Preferred Alternative is selected. The Operating Plan (to private industry it would be termed a business plan) needs to detail the project. It provides guidance to everyone – communities, designers, administrators, etc. – that explains what the project is to do and it allows for everyone to continually check assuring that design and construction work being done is consistent with the Operating Plan.
- While the cost information is sufficient for deciding on options, request that the capital and operating cost be updated for the selected option as soon as the Operating Plan is prepared. Until then, project operating and capital budgets should be considered as draft documents.
- Insist on value engineering that includes the community (consistent with the Operating Plan) for options that may be taken into the next work phase as well as options that may arise during future work. The technical team is required to perform value engineering. The community needs to be included. Try to remember this is the beginning of a project and it can always be made better as long as its original purpose and focus is retained.

Disclaimer

The review of this AA/Draft EIS document was completed based on the planning and environmental technical work presented. The review that was conducted



was not intended to provide a NEPA Legal Sufficiency Review. The review was also not conducted from an engineering perspective. Other expertise should be sought for those types of reviews.

PURPLE LINE PETITION

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I enthusiastically support the Inner Purple Line

1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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From
Tom

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4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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1. A generally at-grade light rail line that is primarily on its own right of way;
2. Excellent service linking the Bethesda, Silver Spring, College Park and New Carrollton Metrorail Stations with stops in Chevy Chase, Long Branch, Langley Park, the University of Maryland (on campus), Riverdale Park and other communities along the transit corridor;
3. Completion of the Capital Crescent hiker-biker trail alongside the transit line on the Georgetown Branch railroad right of way between Bethesda and Silver Spring and important pedestrian safety upgrades elsewhere along the project corridor;
4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner without impeding the speedy implementation of this project.

[illegible]

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4. A community- and environmentally-friendly design that mitigates negative impacts in a cost-effective manner.

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- RECORD #1165 DETAIL

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Submission Content/Notes : My name is Harry Sanders, H-A-R-R-Y, S-A-N-D-E-R-S.

I am President of Purple Line Now. My transit advocacy started in College Park over years ago working to ensure a Metro green line. But we always say, miss the campus in those days.

I strongly favor a cost effective combination of the medium and high level LRT options presented in DEIS, including a hiker/biker trail through the Bethesda tunnel.

I support the purple line crossing the University campus because the trains are quiet and pollution free and will provide direct service to this great institution.

I cannot support the same option for huge buses passing at much greater frequency. I urge the students and the University administration to make clear their opposition to BRT given that this bus option is being pushed by a well funded effort based in Chevy Chase and a country club. Why I support LRT. First, ridership and travel times are better for LRT. Many speakers have talked about that. What is more dramatic is that travel time differences between key points along the line, including Bethesda, Silver Spring and College Park, campus.

For example, the medium cost option takes 49 minutes to go from College Park to Bethesda, while the medium rail option takes minutes, a 15 minute difference. One auto owner is going to ride a bus for 49 minutes.

The vehicle capacity of BRT is lower than LRT. The DIS references the use of larger buses seating up to 60 passengers, but the study assumes an average up to 110 passengers per bus.

This may be feasible, but it does not, but it means an average of up to 50 standees per bus. This is not attractive to transit riders who do not like to stand on buses.

And also it impacts the frequency in number of buses needed. The DIS travel forecast need at 6-minute headways (inaudible) to move nearly 1,900 bus passengers per hour.

But because this overloads the buses, seven - buses per hour are added, making the headway actually closer to a bus every four minutes.

The actual capacity is used of 100 passengers is really a bus every three minutes. This would result in a higher operating cost than projected, and the buses will catch up to each other in traffic lights resulting in unreliable operations.

Finally, the Baltimore LRT is not a good model for LRT cost. It has much less ridership than the purple line. There are better models out there.

In conclusion, as a result of these three issues and many others, I feel light rail costs are over-estimated. Let us not be penny wise and pound foolish. Build light rail now.

- RECORD #1337 DETAIL

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Zip Code : 20910
Email Address :

Submission Content/Notes : Good evening. My name is spelled W-E-B-B, last name S-M-E-D-L-E-Y. And I'm speaking tonight on behalf of Purple Line Now. Purple Line Now is a coalition of civic, environmental labor business and municipalities in both Montgomery and Prince George's counties. I'm also the president of the Woodside Civic Association, which represents home owners along the route of the Purple Line in Silver Spring in the Woodside community.

We strongly support the light rail Purple Line alongside a completed Capitol Crescent Trail. BRT is not appropriate for the Purple Line. There are no busways in the United States that carry 68 thousand riders per day. We are concerned that the DEIS overstates the operation and maintenance cost per, for the rail option while understating them for the bus option. This should be corrected in the following ENVIRONMENTAL IMPACT STATEMENT.

A light rail line integrated with our Metro rail system will attract many more riders, have a far more positive community impact, provide a transit capacity for the long-term and be more compatible with the Capitol Crescent and other hiker/biker trails. The DEIS demonstrates clearly that doing nothing is not an option. I am a Silver Spring to College Park commuter who witnesses the growing need for the Purple Line on a daily basis. East-west transportation is reaching a break down point.

I moved to Silver Spring more than 20 years ago with a job in D.C. and a pleasant Metro rail commute. I began working in College Park 12 years ago and the J4 Express buses are stopped in the same traffic as everyone else. When it rains, many drivers simply avoid the beltway, including myself, so back ups on other roads quickly grow.

If the Purple Line is not built, families, businesses, and communities will increasingly suffer as delays shift traffic onto neighborhood streets.

I want to echo Ana Sol-Gutierrez' remarks regarding the Washington area bicyclists association support for rail and trail. Under the medium LRT option, completion of the Capitol Crescent Trail between Bethesda and Silver Spring will include 6 safe crossings of roads and rail lines along the way. I became active in this effort when my young son was nearly killed before my eyes trying to cross 16th Street on the Interim Capitol Crescent Trail. That was nearly 20 years ago.

The Interim Trail remains unsafe today. We look forward to completion of a safe trail running alongside quiet light rail line and urge the governor to move this project into preliminary engineering as quickly as possible.

- RECORD #2422 DETAIL

First Name : Webb
Last Name : Smedley
Business Name : Purple Line Now
Address :
City :
State : MD
Zip Code :
Email Address :

Submission Content/Notes : Re: AA/DEIS for the Purple Line

Please enter the attached Washington Post editorial endorsing the Light Rail Transit option for the Purple Line into the public record for the project.

Sincerely,

Webb Smedley, Chair
Purple Line NOW!
8704 Second Avenue
Silver Spring, MD 20910

Washington Post January 4, 2008

Forward, Purple Line
Maryland officials should unite behind light rail.

The Washington Post editorial
Sunday, January 4, 2009

Since 1986, the Soviet Union has collapsed, two Bushes have been elected to the White House and exactly zero miles of the Purple Line have been constructed in Maryland. For backers of the project, under consideration since that year, it might seem as if it's easier to topple a communist empire than to get 16 miles of transit line built. But -- and we say this with considerable caution -- it seems as if the obstacles that have held up the project are receding and the line, which would connect Bethesda in Montgomery County to New Carrollton in Prince George's County, is closer to becoming a reality.

Recent developments encourage our optimism. In October, a key report found that there are multiple Purple Line routes that would meet federal funding standards while having a relatively minimal impact on the environment. The six-year state study, known as a Draft Environmental Impact Statement, found that bus rapid transit would be cheaper but that light rail would have better ridership numbers and quicker travel time.

Last month, Montgomery County planners endorsed light rail. They found that light rail, which could cost as much as \$1.6 billion, is more cost-effective in the long term and has a greater capacity to handle ridership. They recommended that light rail run along the Georgetown Branch Trail in Silver Spring and Chevy Chase, a path popular with walkers and cyclists. The Planning Board will send a final recommendation to the County Council in coming weeks.

The surge of support for light rail has riled opponents of the route, who contend that rail would disrupt the trail and bring blight to their neighborhoods. They argue that bus transit is a less intrusive option that is more likely to be funded by the federal government. But few projects are as attractive to federal funders as the Purple Line, which would ferry thousands of federal workers and has one of the highest ridership estimates of proposed transit projects in the country.

It's become evident at recent public hearings that community support is

coalescing around light rail. The onus is on Montgomery officials and state leaders to support the route. The County Council, which will vote to recommend a route late this month, is expected to overwhelmingly support light rail. The vote is important, as is the intensity with which county leaders lobby state officials behind closed doors. Gov. Martin O'Malley (D) is expected to choose a final route and to start seeking federal funding this year.

If the project is delayed further, it won't be because of a lack of planning or public support -- it will be because of a failure of political leadership. Maryland officials must resist the relentless lobbying of light-rail critics and unite behind the route to present the strongest case for federal funding. Two decades of dithering is long enough.

##

- RECORD #2699 DETAIL

First Name :	Webb
Last Name :	Smedley
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Address :	8704 Second Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	PURPLELINENOW@GMAIL.COM
Submission Content/Notes :	
Attachments :	Smedley_Webb.pdf (596 kb)

8704 Second Avenue
Silver Spring, MD., 20910

January 13, 2009

Ms. Diane Ratcliff, Director
MTA Department of Planning

Via e-mail

Re: Comments in Support of the Medium Light Rail Transit Alternative for the Purple Line

Dear Ms. Ratcliff:

Last month marked a major milestone in progress towards completion of the light rail Purple Line connecting inner suburban communities in Montgomery and Prince George's Counties. Hundreds of individuals came out in support of the light rail transit option at four hearings. Editorial support was provided by the Gazette and Washington Post. Prince George's County locked arms in support of the project, with the Council and County Executive joined by uniform support on the part of the Prince George's County delegation and among municipalities such as College Park, Riverdale Park, Hyattsville, Greenbelt and Edmonston - who reject the idea that transportation priorities should be dictated by golf clubs or exclusive communities of wealth and privilege.

We applaud the Montgomery County Planning Board's staff for taking the first step toward the affirmation of Montgomery County's position in support of the Light Rail Transit option for the Purple Line and hope the Montgomery County Board will support most of the conclusions of the staff report on 1/15/09.

Most important in this Planning Board review is the long history of support for the light rail Purple Line on approved master plans in Montgomery County. As noted in the staff report: "*Vision staff note that, of the proposed BRT and LRT Purple Line alternatives in the DEIS, only the LRT alternatives conform to the approved and adopted Master Plans. In addition, the DEIS reviewed other alternatives including a Transportation System Management (TSM) option, and a No Build alternative which were not in conformance with approved and adopted Master Plans.*"

We support the following recommendations and observations made by the Planning Board staff:

- That light rail, and not bus rapid transit, can carry the heavy passenger loads foreseen for the Purple Line beyond the 2015 time frame.
- That the project should make use of the Georgetown Branch alignment between Bethesda and Silver Spring;
- That the hiker-biker trail between Bethesda and Silver Spring should be completed as part of the project, including parallel routes in Bethesda through the Air Rights Tunnel and on Bethesda and Willow Avenues, and along an off-road corridor along the CSX right of way into the Transit Center in Silver Spring; We agree with our allies in the Washington Area Bicyclist Association (WABA) that

this trail, alongside rail lines for most of its length, will be hugely popular and that planners should therefore aim for a 12 ft trail width (with two 2 ft shoulders) wherever feasible;

- That the project should include a stop serving Downtown Silver Spring and the Fenton Village area integrated with the new Silver Spring library. We do not believe the Board should recommend study of any tunnels through East Silver Spring if this requires sacrifice of a Fenton Street stop for the Purple Line.

The Purpose and need for the Purple Line was clearly stated: ***“Faster, more direct and more reliable east west transit service in the Purple Line corridor which would connect the four major activity centers”***

The No Build and Transportation Systems Management options do not meet this purpose and need. They will not be faster or more direct.

The Jones Bridge Rd option also does not meet the Purpose and Need – it is not a faster and more direct connection of our two major centers – Bethesda and Silver Spring.

Doing nothing is not an option because, the DEIS shows, trips within the corridor expected to increase by 43% by 2030. If we do nothing, the pain will extend to all – families, communities and businesses. Instead of preparing a new and greener economy, we will set the stage for prolonged stagnation.

Purple Line *NOW!* has always been careful to support MDOT’s position that Maryland should move forward with the study of three transit projects, all of which are important to the smart-growth future of our state. Lately, there has been much discussion about whether Montgomery County can afford the Purple Line. But we wonder, based on the data, why the Baltimore region should get a new rail line and Montgomery County settle for more buses. The rail options for the Purple Line demonstrate ridership levels of about 68,000 trips per day in 2030. That is higher than any BRT lines and most existing and proposed Light Rail lines in the U.S. The proposed Baltimore Red Line shows 41,000 trips for 2030 WITH A LONG TUNNEL. Without that expensive tunnel, the ridership is projected to be half that of the Purple Line - 34,000 - for this 14 mile line.

The Town of Chevy Chase continues to suggest that BRAC should cause a rethinking of the Purple Line. But BRAC will increase jobs in the Medical Center area by 2,200 to 2,500 jobs; this is a small portion of the overall jobs in the Bethesda CBD. – projected to grow by 20% between 2000 and 2030.

Housing growth in the Medical Center area is projected to grow minimally, while that in downtown Bethesda is projected to nearly double from 2000 to 2030, as is shown on Table 1-5 of the DEIS.

Silver Spring embraces the Purple Line, because 24% of its households have no car as is shown on Table 1-4 of the DEIS. It is a transit-supportive community that is clearly ready to shift more trips from bus to rail. There are already 100 buses entering downtown Silver Spring every rush hour, creating noise and localized air pollution that is not created by Light Rail. Even in Bethesda, 18% of the households are without a car and these people want better transit too.

Daily reduction in auto trips for the region 11,400 to 20,500 for build options and this translates into more livable communities for our transit oriented citizens.

Opponents of the Purple Line have suggested that the light rail project is not green enough, but the light rail Purple Line has been endorsed by 21 major planning and environmental advocacy organizations in our region including the Chesapeake Bay Foundation, Sierra Club, Coalition for Smart Growth, 1,000 Friends of Maryland, Chesapeake Climate Action Network and others (see:

http://www.purplelinenow.com/published/how_you_can_help/supporter_list.html for the entire list).

Now some of these opponents, who previously argued for expensive tunnels or a \$7 billion outer Purple Line say we should instead do a discount bus line – avoiding the Town of Chevy Chase, or do nothing at all.

We have a tremendous opportunity to move this project forward. On a daily basis, the news is replete with references to plans for the new Obama administration to promote green infrastructure.

We urge you to prioritize funding for Preliminary Engineering of the Light Rail Purple Line. Let us not waiver at this critical time.

Sincerely,



Webb Smedley

- RECORD #1345 DETAIL

First Name :	Maureen
Last Name :	Jais-Mick
Business Name :	Rethinking the Purple Line
Address :	7017 Exfair Road
City :	Bethesda
State :	MD
Zip Code :	20814
Email Address :	

Submission Content/Notes : Maureen Jais-Mick, M-A-U-R, double E, N, Jais-Mick, J-A-I-S, hyphen, M-I-C-K. I represent Rethinking the Purple Line, a coalition of citizens in 18 Maryland communities interested in Purple Line alternatives that 1) serve the most people in jobs, 2) are the most affordable, and 3) preserve the Capitol Crescent Trail as a natural and safe green space. Of the alignments covered by the ENVIRONMENTAL IMPACT STATEMENT, we support the Jones Bridge Road Alignment.

In 1989, when Governor Schaefer offered Montgomery County 70 million dollars to build a cute, little single track trolley on the Capitol Crescent Trail, none of us could imagine 20 years later the transfer of Walter Reed services to the Bethesda Naval Medical Center and how that would drastically change our public transportation needs.

Bus rapid transit along Jones Bridge Road will serve more people and jobs. As reported by Sam Swartz Engineering, the JONES BRIDGE ROAD alignment currently serves more than twice as many jobs as the trail alignment and employment in this area is expected to grow 19 percent by 2030, compared with 16 percent job growth along the trail alignment. Those of us who live or work near the Naval Medical Center are concerned about congestion and taking cars off the road. As many people have mentioned, this is not a priority of the Purple Line.

Number two, bus rapid transit is more affordable. The Environmental Impact Study offers light rail and bus rapid transit alternatives. Light rail is not only more than twice as expensive as bus rapid transit to build, it is more expensive to maintain. And in some cities, actually Portland, Oregon, is one example, it has actually reduced the percentage of people using public transportation because of the high fares.

The Environmental Impact Study is vague about fares. The Purple Line transfers to Metro will initially be free. In Maricopa County, Arizona, whose light rail service hasn't even opened its doors yet, the light rail fares are now being substantially raised to cover costs. The increases are projected to decrease passenger boardings by 28 million people over three years, especially those in low-income communities.

In St. Louis, fares cover only 28.2 percent of operating costs, in Baltimore, 19.4 percent, and in Buffalo, 21.4 percent. It is irresponsible to pay 100 million dollars a mile for a light rail system when we can't meet our contractual obligations to our teachers and other county employees. And it would be irresponsible to spend a hundred million dollars per mile for a system that would need a huge subsidy forever even if we were flush with cash.

Number three, preserve the Capitol Crescent Trail as a natural and safe green space. Along with Smart Growth, we also need to be smart about growing and saving our green spaces. On November 14th, Governor O'Malley unveiled Maryland Smart, Green and Growing.

At the ceremony, John Griffin, the Secretary of the Department of Natural Resources pointed out that quote, forests are the regions most strategically important natural resources. We agree. The ENVIRONMENTAL IMPACT STATEMENT minimizes that 17 acres of trees will be bulldozed to make way for a light rail or a bus rapid transit route on the trail.

Most disturbingly, the statement makes it clear that funding for construction and maintenance of a trail alongside a transway is not secure. Each week, 10,000 pedestrians and bikers use the Georgetown Branch of the Capitol Crescent Trail for recreation and commuting. We don't want to push our strollers next to trains that run every three

minutes. We don't want to exercise on a tree-less path that is miserably hot in summer. We don't want our kids and their kids to bicycle where there used to be trees that cleaned our air, protected our water quality, eliminated storm-run and run off and provided habitat for wildlife. What we want is a better Purple Line. Thank you.

- RECORD #2227 DETAIL

First Name :	Maureen
Last Name :	Jais-Mick
Business Name :	Rethinking the Purple Line
Address :	7017 Exfair Road
City :	Bethesda
State :	MD
Zip Code :	
Email Address :	jaismick1@verizon.net
Submission Content/Notes :	
Attachments :	Wrtn Tstmny. M. Jais-Mick.pdf (2 mb)

Purple Line DEIS Testimony

My name is Maureen Jais-Mick. I represent *Rethinking the Purple Line*, a coalition of citizens in 18 Maryland communities interested in Purple Line alternatives that (1) serve the most people and jobs, (2) affordable, and (3) preserve the Capital Crescent Trail as a natural and safe green space.

(1) Serve the most people and jobs – Bus Rapid Transit will serve more people and jobs.

Of the alignments covered by the EIS, we support the **Jones Bridge Road Alignment**. In 1989, when Governor Schaefer offered Montgomery County \$70 million to build a cute little single track trolley on the Capital Crescent Trail, none of us could have imagined that 20 years later the transfer of Walter Reed services to the Bethesda Naval Medical Center would drastically change our public transportation needs.

Bus Rapid Transit along Jones Bridge Road (JBR) will serve more people and jobs. As reported by Sam Schwartz Engineering, “The JBR alignment currently serves more than twice as many jobs as the CCT alignment and employment in this area is expected to grow 19% by 2030, compared with 16% job growth along the CCT alignment.”¹ Those of us who live or work near the Naval Medical Center are concerned about **congestion**. Unfortunately, this is not a priority of the Purple Line, which aims simply to decrease travel times from east to west.²

(2) Affordable – Bus Rapid Transit is more affordable

The Environmental Impact Study (EIS) offers light rail and bus rapid transit alternatives. Light rail is not only more than twice as expensive as bus rapid transit to build, it is more expensive to maintain, and in some cities – Portland OR is one example – it has **reduced** the percentage of people using public transportation, due to its high fares.³

The EIS (page 2-31) is vague about **fares** – Purple Line transfers to Metro will “initially be free,” but then what? In Maricopa County AZ, whose light rail service hasn’t even begun, both bus and light rail fares are being substantially raised to cover costs. The increases are projected to decrease passenger boardings by 28 million people over three years.⁴

In St. Louis, fares cover only 28.2 percent of operating costs; in Baltimore 19.4 percent; and in Buffalo 21.4 percent. **Taxpayers pay the rest - forever**. It is irresponsible to pay \$100 million per mile for a light rail system when we can’t meet our contractual obligations to our teachers and other County employees. Even if times were great, it would be **irresponsible** to spend \$100 per mile for a system that will need a subsidy forever.

¹ “Analysis of MTA Purple Line Alternatives and Alignments,” Sam Schwartz Engineering, April 23, 2008, page 13.

² It appears that the Purple Line would primarily serve as a feeder to existing Metro stations for a continuation of north/south travel. This function could be better and much more cheaply achieved by improving existing bus service or upgrading to bus rapid transit.

³ Randal O’Toole, “Debunking Portland – The City That Doesn’t Work,” in *Policy Analysis*, July 9, 2007, page 5.

⁴ AZCenter.com

(3) Preserve the Capital Crescent Trail as a natural and safe green space.

Each week, 10,000 pedestrians and bikers use the Georgetown Branch of the Capital Crescent Trail for recreation and commuting.

Along with “smart growth” we also need to be smarter about growing and saving our green spaces. On November 14th, Governor O’Malley unveiled *Maryland: Smart, Green & Growing*. At the ceremony, John Griffin, Secretary of the Department of Natural Resources, pointed out that “Forests are the region’s most strategically important natural resources.”⁵ We agree.

The EIS minimizes the fact that 17 acres of trees⁶ will be gone forever to make way for a light rail or a bus rapid transit route on the Trail. Most disturbingly, the EIS makes it clear that funding for construction and maintenance of a trail alongside a transitway is not secure.

We don’t want to push our strollers next to trains that run every three minutes. We don’t want to exercise on a tree-less path that is miserably hot in the summer. We don’t want our kids and their kids to bicycle where there used to be trees that cleaned our air, protected our water quality, eliminated storm water runoff, and provided habitat for wildlife.

What we want is a better Purple Line.

Thank you.

Maureen Jais-Mick
7017 Exfair Road
Bethesda MD 20814
jaismick1@verizon.net
Edgemoor Neighborhood (west Bethesda)

⁵ “Governor O’Malley Announces Smart, Green & Growing Initiative,” Press release issued by Shaun Adamec and Christine Hansen in Governor O’Malley’s office.

⁶ Figure from American Forests.

- RECORD #101 DETAIL

First Name : Marty
Last Name : Newman
Business Name : RRC Community Association, Inc.
Address : 5826 Quintana Street
City : Riverdale
State : MD
Zip Code : 20737
Email Address : martybill@verizon.net
Submission Content/Notes : Has the Purple Line project been placed on hold due to the state's budget issues?

- RECORD #505 DETAIL

First Name :	Pam
Last Name :	Browning
Business Name :	
Address :	4317 Elm Street
City :	Chevy Chase
State :	MD
Zip Code :	20815
Email Address :	PBROW@VERIZON.NET

Submission Content/Notes : Dear Governor Martin O'Malley,
MTA Planning Director Diane Ratcliff,
County Executive Isiah Leggett,
Chairman Royce Hanson,
Council President Mike Knapp,

As the organizer of the Petition to Save the Capital Crescent Trail, I received a copy of the email from Mr. Shah, below, that was sent to you earlier today. I do not know this individual, and the views expressed in the first paragraph of his email are repugnant to me. I have spent my entire professional life working on behalf of social justice and environmental causes. And I believe that most, if not all, of the thousands of hikers and bikers who love the Capital Crescent Trail as I do, are respectful of people everywhere -- including those in Prince Georges County.

Mr. Shah has taken a sample letter from my Petition website (which I encourage you to visit) and twisted the first paragraph in a way that has nothing to do with the Save the Trail effort.

I suspect that this email sender may be a provocateur, attempting to tarnish efforts to preserve the Capital Crescent Trail. I have heard so much about this kind of ugly behavior in just the last few days in the news and in blogs, that I have to wonder if this is an orchestrated effort.

Never in my experience of talking to thousands of Trail users have I heard these views expressed. Nor have I heard these views from residents of Bethesda-Chevy Chase in the 21 years that I have lived here.

I would hope that you would disregard Mr. Shah's email and its association with our cause to preserve the beautiful tree lined greenspace and Trail between Bethesda and Silver Spring.

Thank you very much.

Very Sincerely,

Pam Browning, Organizer
Petition to Save the Trail
<http://www.savethetrailpetition.org/>
4317 Elm Street
Chevy Chase, MD 20815
301-654-0183

Jigar Shah wrote:

Dear: Governor Martin O'Malley,

MTA Planning Director Diane Ratcliff

County Executive Isiah Leggett,

Chairman Royce Hanson,

Council President Mike Knapp,

I am a Trail user. There is no need for PG county public in nice areas of Bethesda and Chevy Chase! It will devalue the houses and make the whole area unsightly and ugly & more crime. Underground train would

be more expensive. A bus would do just fine. Lets save money and have a bus instead of an underground or above ground train system. Montgomery county doesn't need to be blended with PG county.

More than 10,000 hikers and bikers use the Capital Crescent Trail between Bethesda and Silver Spring every week. By the year 2030 (the year for which MTA's Purple Line Ridership estimates are projected), all of our Trails will be dangerously overcrowded.

Currently, Trail users of all ages walk and bike on the Trail. It will not be safe to have high speed bikers, dog walkers, families with small children, and the elderly, strolling and biking, passing in two directions, within a 10' wide sidewalk, about 10' from trains passing by every three minutes.

I urge you to build the Purple Line somewhere other than along the Capital Crescent Trail.

All of the beautiful trees that currently shade the Trail would be bulldozed -- to level the narrow berm that the Trail runs on now -- in order to squeeze in the two sets of tracks for a Purple Line.

I, along with thousands of other Trail users, would be distressed to see this natural Trail degraded and the surrounding mature forest destroyed for a Purple Line.

I urge you to seek transit solutions that preserve our quality of life and protect our valuable environmental resources – including our mature trees and natural trails – by putting the Purple Line either underground or in another location.

Thank you for your consideration.

Sincerely,

Jigar Shah
10003 Vanderbilt Cir
Rockville, MD 20850

- RECORD #2084 DETAIL

First Name :	Merle
Last Name :	Cuttitta
Business Name :	SEIU Local 500
Address :	901 Russell Avenue
City :	Gaithersburg
State :	MD
Zip Code :	20879
Email Address :	LICHTERJ@SEIU500.ORG

Submission Content/Notes : Dear Elected Official,

Thank you for your support for the Purple Line. As you know, this environmentally friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of SEIU Local 500 are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

SEIU Local 500 represents 16,000 workers in Maryland and 18,000 workers throughout the metropolitan region. Our members would directly benefit from the Purple Line by both shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement we know that the Purple Line will be a great asset for our members, all working families, and communities of color. For too long, the primarily African-American and Latino workers of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions' major job centers, but will greatly reduce travel times and provide transportation equity by offering the working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge you to support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built without delay.

Respectfully,

Merle Cuttitta

Attachments :

Local 500 Purple Line Support Letter.pdf (89 kb)



Dear Elected Official,

Thank you for your support for the Purple Line. As you know, this environmentally friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of SEIU Local 500 are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

SEIU Local 500 represents 16,000 workers in Maryland and 18,000 workers throughout the metropolitan region. Our members would directly benefit from the Purple Line by both shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement we know that the Purple Line will be a great asset for our members, all working families, and communities of color. For too long, the primarily African-American and Latino workers of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions' major job centers, but will greatly reduce travel times and provide transportation equity by offering the working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge you to support *a light rail Purple Line* to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built without delay.

Respectfully,

Merle Cuttitta

MERLE A. CUTTITTA
President

BETTY MONTGOMERY
Executive Vice President

RUTH MUSICANTE
Treasurer

LYNNET ANDERSON
Secretary

LINDA B. GRAY
Trustee

PIERANGELI MORRISON
Trustee

DAVID N. RODICH
Executive Director

SERVICE EMPLOYEES
INTERNATIONAL UNION
CTW, CLC

901 Russell Avenue
Suite 300
Gaithersburg, MD 20879
301.740.7100
Fax: 301.740.7139
Toll-Free: 888.871.8659

- RECORD #732 DETAIL

First Name : Mark
Last Name : Gabriele

Business Name :

Address :

City :

State : MD

Zip Code :

Email Address : GABRIELE@MAC.COM

Submission Content/Notes : Dear Ms. Ratliff,

Attached, please find a .pdf file which contains written comments regarding the AA/DEIS for the proposed Purple Line. These comments are submitted on behalf of the Seven Oaks / Evanswood Citizens' Association, a Montgomery County-Chartered civic organization for which I serve as President.

Should you have any questions or require any clarification, please feel free to contact me.

Attachments : SOECA COMMENTS ON PURPLE LINE.pdf (62 kb)

WRITTEN COMMENTS ON PURPLE LINE AA/DEIS – SUBMITTED BY SEVEN OAKS-EVANSWOOD CITIZENS ASSOCIATION (SOECA), MARK GABRIELE, PRESIDENT – ISSUES RELATING TO THE ROUTING THROUGH DOWNTOWN SILVER SPRING AND ON WAYNE AVENUE

Ms. Diane Ratliff
Director of Planning
Maryland Transit Administration

I am submitting these written comments to be included in the record of the review of the Purple Line Alternatives Analysis/Draft Environmental Impact Statement.

I am Mark Gabriele; I reside at 831 Woodside Parkway, Silver Spring, Maryland 20910, and I am the President of Seven Oaks-Evanswood Citizens' Association (SOECA), which represents approximately 700 households directly to the northeast of the Silver Spring Central Business District, including a number of neighborhoods on Wayne Avenue and on both sides of Wayne, Dale Drive, and Sligo Creek Park as far west as Colesville Road.

The overwhelming majority of SOECA has asked MTA to route the Purple Line under a half mile of Wayne Avenue so as to connect with a tunnel under the downtown that MTA has studied but does not favor. The community believes that whether the Purple Line is light rail or bus rapid transit, tunneling under Wayne Avenue and downtown Silver Spring is necessary to improve the overall efficiency of the Purple Line and make it a more appealing transit option through Silver Spring, while avoiding increased traffic congestion in the downtown and significant adverse impacts to the adjacent neighborhoods to the east of the downtown. Our community welcomes the Purple Line, but insists that it be tunneled, such as has been the case for Metro through all neighborhoods in the District of Columbia where Metro does not run on a railroad right of way.

According to MTA data, the length of the downtown portion of the tunnel – from the Silver Spring Transit Center to Wayne Avenue – would be 4,350 feet, or just more than four-fifths of a mile. According to MTA, the length of a tunnel under Wayne from Cedar Street to Mansfield Road (emerging prior to Sligo Creek Parkway) would be an additional 2,575 feet, or just under half a mile. The total tunnel segment from the Silver Spring Transit Center to Mansfield Road would be 6,925 feet, or 1.3 miles.

This segment of the Purple Line in Silver Spring, if run at surface, is likely to be the slowest, most inefficient, and traffic-jamming segment of the 16 miles.

The surface route that the MTA has proposed on Wayne Avenue will bisect the community and will run on what will be the only essentially residential road in the entire 16 miles of the project, even if it also functions as an “arterial” road into the business center. Virtually all other segments of the Purple Line will be on current or former railroad rights of way or on wide boulevards. Moreover, MTA’s widening of nearly two-thirds of the just more than one mile on Wayne on which the surface route would run – primarily for long left-turn lanes at signaled intersections – will increase the traffic capacity on Wayne, and eventually traffic will grow to fill

it. The widening on Wayne will be combined with slow-moving lanes that are shared by Purple Line vehicles and cars. Ironically, traffic will increase, not decrease, on Wayne as a result of the Purple Line. Furthermore, prior to the Purple Line, the County had approved plans to effectively narrow Wayne Avenue by replacing a lane with what was to be the “Green Trail”, a bike path designed to increase the safety and convenience of bicycle commuting.

Even more importantly from the perspective of the County, a surface route from the Silver Spring Transit Center on roads through the center of downtown Silver Spring will have devastating traffic impacts on the business district, even worse than is the case today, and the vitality of the recently revived downtown, in which the County has heavily invested, will be threatened. According to MTA data, on the average of every three minutes from one direction or the other (every six minutes from one direction), during three-hour peak periods in both the morning and evening, long 180-foot-long trains will crawl past Georgia Avenue, enter the intersection of Wayne and Fenton Street diagonally as a fifth stream of traffic, and pass the parking lot entrance to the Whole Foods shopping center – at what are likely to be speeds of no more than 5 to 15 miles per hour. This surface route in the downtown is likely to increase traffic gridlock as well as convert what should be a rapid trip into a long slog through the downtown. It should be kept in mind that MTA’s figures indicate that only a small portion of the Purple Line ridership will be coming from cars, as most will be coming from buses and other forms of mass transit. Therefore, not many cars will be coming off the road to offset these traffic delays.

Tunneling

MTA and others have said that a tunnel would be too expensive, would not be cost-effective, and would provide few benefits. However, MTA recently released data that tends to indicate that while a tunnel is not cheap, it can be designed to be part of a “hybrid” route that keeps costs reasonable, improves ridership and travel times, and remains competitively cost-effective for purposes of qualifying for federal funding. After MTA released its study in October, it provided figures to the Montgomery County Planning Department for a “hybrid” (“mix and match” segments) for the entire 16 miles that would take what is known as the “medium-investment LRT alternative” and mix it with a tunnel under the downtown – keeping the surface route on Wayne but removing the stations at the new Silver Spring Library (Bonifant and Fenton Streets) and at Dale Drive. The results indicated that a hybrid with a tunnel under the downtown *is* cost effective (a term of art that the Federal Transit Administration uses for determining eligibility for funding). In fact, the cost effectiveness measure is virtually the same as the medium-investment light rail alternative that MTA evaluated – the cost effectiveness figures fall within 0.3% of each other. Moreover, MTA’s figures also showed that such a hybrid would both decrease travel time and increase ridership. In fact, ridership for the entire Purple Line increased by a significant 2,100 riders, even though MTA had indicated to the community earlier that a tunnel without stations at the library and Dale Drive would result in the loss of 2,375 riders.

The Montgomery County Planning Department has now requested that MTA provide data about a second hybrid – one that would be similar to the first hybrid, but, in addition, would include the half mile of tunneling under Wayne from Cedar to Mansfield. The Planning Department has estimated that this second hybrid would cost just under \$1.4 billion and that the cost effectiveness of this option would be within the acceptability range for purposes of federal

funding. The \$1.4 billion figure is still significantly less than the more than \$1.6 billion for the high-investment LRT alternative (which had been the most expensive of six LRT and BRT alternatives that the MTA had previously evaluated). Also, compare the \$1.4 billion figure with the \$5.2 billion cost of the Dulles Silver Line Metro project, which the Federal Transit Administration in early December recommended for federal funding in spite of the fact that the FTA had earlier indicated that this project was not cost effective.

Below is the chart that MTA provided the Planning Department on October 27, 2008 regarding the first hybrid:

Measure	Medium Investment LRT	Medium Investment LRT with High Investment Tunnel Segment*	High Investment LRT
2030 Daily Boardings	62,600	64,700	68,100
2030 New Daily Riders	11,000	11,200	12,300
2030 Annual User Benefits (hours)	6,389,000	6,601,000	7,299,000
Capital Costs (2007 dollars)	\$1,220,000,000	\$1,330,000,000	\$1,635,000,000
Annual O&M Cost (2007 dollars in millions)	\$25,000,000	\$24,000,000	\$22,200,000
FTA Cost-Effectiveness Measure (cost per hour of User Benefit) relative to TSM	\$22.82	\$22.89	\$23.71

* includes High Investment LRT segment between Silver Spring Transit Center and Manchester Place (tunnel segment between Silver Spring Transit Center and Wayne Avenue at Cedar Street; no Dale Drive station)

[Note: For FTA funding purposes, a project with a cost effectiveness figure of \$24.00 or less fall within the acceptability range. Where a project falls within the acceptability range generally does not matter to FTA. If the cost effectiveness figure is over \$24, the case for federal funding is much harder to make. In fact, the light rail alternatives, which MTA appears to favor, have much higher cost effectiveness figures (that is, they are less cost effective) than the bus rapid transit alternatives.]

MTA's Purple Line project manager, Mike Madden, was quoted in the Silver Spring Gazette on November 26, 2008 as saying that a tunnel on Wayne Avenue was not feasible since it would need to be tunneled very deep under Sligo Creek and could not reach the surface again until University Boulevard. This is not a helpful statement and is misleading in that it does not speak to the tunnel that the community is actually requesting. What Mr. Madden did not say is that for more than a year, the community has not asked for a tunnel under Sligo Creek, even though our written questions asking for substantiation of the MTA's engineering claims regarding the longer

tunnel were never answered. Since October 16, 2007, at an MTA focus group meeting at Oak View Elementary School in Silver Spring, the community (in response to the concerns that MTA raised) has asked that the shorter one-half mile tunnel under Wayne from Cedar Street to Mansfield Road – one that would emerge prior to Sligo Creek – be studied. For three months, until the middle of January 2008, MTA would not study this. Finally, MTA reported that they had performed a preliminary analysis of the shorter tunnel, and stated that it would study a tunnel no further. Therefore, a full study of the shorter tunnel was never conducted, and MTA's Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) contains only one paragraph on both the longer and shorter tunnel options under Wayne.

MTA gave the following reasons in the AA/DEIS, at pages 2-4 to 2-5, for not studying the half mile of tunneling under Wayne Avenue (that is, the shorter tunnel, which extending eastward would exit prior to Sligo Creek and which the community has asked for): It would add to the project cost and would have “a detrimental effect on the cost”; it would not provide sufficient benefit; it would not provide travel time benefits; it would be necessary to retain stations for the community and underground stations would cost too much; and a tunnel portal (entrance/exit ramp into/out of tunnel) would result in street widening and retaining walls in front yards due to steepness, as well property being taken from Sligo Creek Park.

However, the facts are these:

1. The figures MTA recently provided the Planning Department indicate that travel time and ridership would improve significantly, even with a tunnel that extends only under the downtown. Those figures will improve somewhat more with the additional half mile of tunneling under Wayne.
2. The same data which MTA provided the Planning Department shows that the costs are reasonable, and the implication that the shorter tunnel would not be cost effective appears not to be the case.
3. The community did not ask for a station at Dale Drive, either at surface or underground. The civic associations formally asked for a study of the longer tunnel under Wayne at the end of September 2007, and on October 16, 2007, MTA announced that the longer tunnel would not be studied and – at the same time – that it was adding a station on Wayne at Dale Drive for the surface route. Prior to the summer of 2007, there was also no station planned for the new library. Originally, there were to be no stations between the Silver Spring Transit Center and Long Branch, about the same distance between the Takoma Park and Silver Spring Metro stations. Presently, there are more planned stations for Silver Spring than for any other segment of the Purple Line. Moreover, in a community of almost exclusively single-family homes within a half mile of the proposed Dale station that are not closer to another station, there is no demonstrated need for a station at Dale. *The alleged need for a station at Dale, which is not supported by reality, should not be used as a reason why tunneling is not feasible under Wayne.*
4. An underground tunnel at Dale would have been the only underground station in the entire 16 miles of the Purple Line. The suggestion of an underground station came only from MTA and has been used to indicate that tunneling would also include a prohibitive \$100-110 million station at Dale.
5. Of course, there would be some widening of Wayne for a tunnel portal somewhere near

Mansfield Road. What MTA does not indicate anywhere in the AA/DEIS is that the tunnel portal would result in widening for the 350 to 400 feet of the portal length, compared to widening for a total of one-half mile (2,640 feet) on Wayne between Fenton Street and Sligo Creek Parkway for long left turn lanes and the Dale station that will accompany a surface route. (In fact, MTA's engineering drawings indicate that the surface route would result in approximately 625 feet of widening just for the Dale station – median extending from intersection, long platform, and phasing in of lanes to the station.) Because the surface route along Wayne requires a far greater amount of widening than what would be required for a tunnel portal, MTA's claim that street widening required to support the tunnel portal would represent an adverse impact on the community is disingenuous.

6. When mentioning the possibility of land being taken from Sligo Creek Park for widening due to a tunnel portal, MTA ignores the fact that for its addition of left-turn lanes at Sligo Creek Parkway in the surface route, there will be widening of Wayne for approximately 425 feet past the Park leading up to Sligo Creek Parkway.
7. Although it mentions that there would be widening due to a tunnel portal near Mansfield Road, there is little mention in the AA/DEIS of the widening due to a tunnel portal on Wayne at Cedar Street, at the very edge of the Silver Spring Central Business District (CBD), that would be built if a tunnel under downtown Silver Spring exited at Wayne and Cedar – one of the options which MTA did study in the AA/DEIS. And there is little mention of the widening of streets and the impacts on property, both within and outside of the right of way, of tunnel portals in other segments of the Purple Line, such as on Arliss Street in Long Branch.

Adverse Impacts of Surface Route through Downtown Silver Spring and on Wayne Avenue

The surface route through downtown Silver Spring and on Wayne Avenue has a number of significantly adverse impacts, most of which are not mentioned in the AA/DEIS. These adverse impacts have therefore not been conveyed to the public and decision-makers.

Interestingly, many of these were mentioned to representatives of the civic associations prior to release of the AA/DEIS. The adverse impacts include:

1. Traffic backups that will occur through downtown Silver Spring for several blocks on Georgia Avenue, Fenton Street, and Wayne Avenue as a result of long, slow trains passing through the downtown at 20 times an hour during long peak periods, as discussed above. Neither traffic through the downtown CBD nor traffic on Wayne with a surface route was adequately studied (this lack of an adequate traffic study is addressed below).
2. The loss of space at the long-promised community library due to the Purple Line cutting a wide swath across its property to stop. The proposed stop is only a four-block, six-minute walk to the Silver Spring Transit Center. All retail and housing, existing and planned, near the proposed library, including the Ellworth Street restaurants and shops/Whole Foods/Majestic Theatre/Marriott Courtyard Hotel and the planned development in the Fenton Village area of downtown south of Wayne Avenue, is within five to ten minutes of walking from the Silver Spring Transit Center for slow to moderate walkers.
3. The loss of one or two lanes of parking on Bonifant Street in the midst of a crucial area of redevelopment in the CBD. The loss of parking on one side of Bonifant will also affect deliveries to businesses on Bonifant.

4. The combined impact of the surface route and backup of cars entering and exiting the Wayne Avenue Garage in worsening congestion at the Wayne and Fenton intersection.
5. The impact of frequent trains on traffic entering and exiting the Whole Foods shopping center parking lot, and the impact from the parking lot on the surface route. Neither impacts on and from the Wayne Avenue Garage nor those relating to the Whole Foods parking lot are mentioned in the AA/DEIS despite MTA identifying them as areas of concern in meetings with representatives of the civic associations.
6. The impact of the Purple Line, including the street widening, on St. Michael's Church and its school across the street, including daily crossings of Wayne Avenue by a school full of children to attend mass.
7. The substantial widening of much of the just over one mile of Wayne on which the Purple Line will run, as indicated by MTA's engineering drawings, but not discussed (nor even summarized) anywhere in the AA/DEIS. This widening includes:
 - a. nearly two-thirds of the length of Wayne Avenue, from Fenton Street to the point 900 feet east of Sligo Creek Parkway where the train would veer off Wayne;
 - b. nearly 60% of the distance from Fenton Street to Sligo Creek Parkway;
 - c. virtually the entire block from Fenton to Cedar, and an additional 150 feet east of Cedar;
 - d. widening on Wayne at both sides of Dale Drive for a continuous length of approximately 1,200 feet;
 - e. widening on Wayne at both sides of Sligo Creek Parkway for a continuous length of approximately 1,350 feet.

Most of this will be for long left turn lanes at Fenton, Cedar, Dale, and Sligo Creek Parkway. The widening of Wayne on the eastern side of the Dale Drive intersection will be for a length of approximately 625 feet related to a station at Dale – but this is not mentioned in the AA/DEIS. Some of the widening will be to 70 feet, the width of Colesville Road. At Dale Drive, if MTA decides to put in two station platforms, the drawings indicate that the widening there would be to 90 feet.

8. The widening will result in loss of land from numerous front yards, both within and outside of the legal right of way. The AA/DEIS states that there will be some "strip acquisitions" but does not indicate where these, and all widening (not just the technical strip acquisitions, which are beyond the current right of way), are – even though the widening is indicated on the engineering drawings and the widening has been summarized by one of the civic associations.
9. The widening for long left-turn lanes will result in increased traffic capacity, and eventually increased traffic. This is not mentioned in the AA/DEIS and apparently not factored into the traffic analysis discussed in the Traffic Analysis Technical Report appended to the AA/DEIS.
10. MTA has indicated to the community – but not mentioned in the AA/DEIS or apparently factored into the traffic analysis – that traffic westbound on Wayne Avenue (from Sligo Creek Parkway to the CBD) will be delayed and prohibited from turning left onto Dale Drive toward Piney Branch Road while a train is in the Dale station.
11. The impact of passing trains, increased traffic, wider streets, and possible changes to the bike Green Trail (see below) on the pedestrian safety of independent residents at the Springvale Terrace Assisted Living facility on Wayne.
12. MTA does not indicate in the AA/DEIS that due to the extensive widening of Wayne for the Dale station, it plans to close the Wayne Avenue access to the large parking lot for Silver

Spring International Middle School and Sligo Creek Elementary School and reroute the traffic to Dale Drive and the side streets behind the schools. This will have significant adverse impacts on the schools, neighborhood, and traffic. Although MTA has on several occasions indicated this to the civic associations, it has not notified the two schools' administrators and PTAs of its plan, nor has MTA advised the community of any plan for a redesign of the parking lots that would be safe for the students and in compliance with the law.

13. MTA has told the community that in order to save space, it has recommended to the County that the planned bicycle Green Trail continuing on the north side of Wayne from Whole Foods to Sligo Creek be merged with the sidewalk into a combined bike/pedestrian path. This raises safety concerns for both bikers and pedestrians, including churchgoers, the elderly at Springvale Terrace, and the schoolchildren at the elementary and middle schools at Wayne and Dale. The surface level Purple Line on Wayne will have impacts on the Green Trail, whether it is merged with the sidewalk or not – but this issue is not identified in the AA/DEIS.
14. The noise analysis in the AA/DEIS apparently did not factor in the sounds of braking, clanging bells or beeping, and amplified announcements on the train and at the station as trains near the Dale station. It also did not fully account for the “wheel squeal” that occurs as trains round sharp curves – and there are numerous curves on Wayne.
15. The traffic analysis, as indicated in the Traffic Analysis Technical Report, was evidently based in part on an assumption that cars can travel at 45 miles per hour on Wayne, although the speed limit on Wayne is 30 mph, and at various times near schools, 25 mph. Indeed, the traffic test runs in the Traffic Technical report appear to indicate that at one point, *an MTA test vehicle traveling along the proposed route reached a speed of 50 mph.*
16. The traffic analysis was based upon an assumed traffic growth rate of less than 0.9% annually (not the “approximately one percent per year” stated in the AA/DEIS), despite the fact stated in the AA/DEIS that historical data for the past ten years has shown that the actual growth of traffic in the areas immediately adjacent to East Silver Spring are 1.5% annually and 1.9% annually, respectively. Despite repeated written requests by our community for additional traffic simulations using more realistic values than the 0.9%, MTA specifically declined to perform or provide that analysis.

(A tunnel route under downtown Silver Spring only, with a surface route on Wayne from Cedar Street eastward would have most of the adverse impacts discussed above, given the surface route on Wayne. However, other than indicate that there would be “visual impacts,” the AA/DEIS addresses very little of the impacts of a tunnel portal extending eastward for 350-400 feet on Wayne past Cedar where the downtown tunnel would emerge. These impacts would include widening for the full length of the tunneling. Moreover, a portal at Cedar Street would be one of the worst places on the route to place a portal, since it would be literally at the very edge of the CBD, a half block from the Whole Foods shopping center parking lot entrance on Wayne. This portal would prohibit a left turn from Wayne onto Springvale that provides the fastest access for emergency response paramedics to the Springvale Terrace Assisted Living facility. There would also be a substantial impact on traffic entering and exiting the downtown due to cars having to swerve widely around a portal at that point.)

MTA has never directly and specifically notified the 60 homeowners on Wayne, St. Michael's

Church and its school, Springvale Terrace Assisted Living facility, Sligo Creek Elementary School, and Silver Spring International Middle School of the widening on Wayne, traffic issues, and other potential impacts of the surface route. In fact, these are not adequately discussed, if at all, in the AA/DEIS, a document primarily intended to fully and accurately inform the public.

MTA's projected figures for daily station boardings at the Dale station (a station which was not requested by the community but which MTA has insisted on) is unrealistically high for each of the six light rail and bus rapid transit alternatives studied and does not conform to either field observation or common sense. For medium-investment light rail, the estimate is 1,400 daily boardings for that station a number that is considerably greater than the number of single-family homes (there are few other kinds of residences in the neighborhood) within a half mile of the station! This was also more than the 900 daily station boardings for medium-investment light rail that were projected at the next station to the west, Manchester Place, which is closer to a number of high-rise apartments than the planned Dale station. In fact, the County's daily station boardings at morning rush hour for the Ride On #15 bus (provided by the Planning Department) show only *four* (4) boardings at Dale Drive (and very few at nearby stops) and 145 at the Sligo Creek stop alone. Those using the Sligo Creek stop clearly live nearer to the planned Manchester Place station. It is difficult to see how there can be more than 200 daily station boardings at the Dale station, and yet MTA has used the alleged need for that station as a reason not to seriously consider tunneling under Wayne. Among other concerns about a station at Dale, the community is concerned that due to transit-oriented development, there will eventually be rezoning near such a station permitting commercial development and higher density residential development.

Earlier this year, the County Council took \$60 million dollars off MTA's budget for the Purple Line by authorizing County funds for the building of a south entrance to the Bethesda Metro station. It is clear that a primary purpose this construction is to facilitate the Purple Line and transfer between it and the Red Line. The cost of the half mile of tunneling under Wayne Avenue in poorer neighbor Silver Spring is thought by the Planning Department staff to be around \$65 million.

There seems to be consensus among many that an effective east-west transit system is needed in Montgomery and Prince George's Counties, and this community fully supports that concept. Yet, the Purple Line that has been proposed is not Metro, and it is not Metro-like rapid transit. According to MTA figures, the Purple Line is 8 to 10 minutes slower end to end (Bethesda to New Carrollton) at rush hour for medium-investment light rail than it now takes during rush hour to take the Red Line from Bethesda to DC Metro Center, transfer to the Orange Line, and take that to New Carrollton. The Purple Line AA/DEIS in its analysis of greenhouse gas emissions, at page 4-48, states that greenhouse gas emissions in the form of CO₂ emissions for each of the six light rail and bus rapid transit alternatives studied "demonstrate almost no change" from the No Build alternative in the same future year. It further states (same page), as confirmed by an accompanying chart, that all three light rail alternatives "are predicted to produce slightly higher CO₂ emission burdens as compared to the No Build alternative."

This community clearly believes that there are benefits to a Purple Line, but given the above drawbacks of a far less than stellar option – one that as designed does not compare to the Metro

system and is more of a streetcar system – does it make sense that neighborhoods adjacent to downtown Silver Spring and the usability of the downtown be sacrificed for this type of a Purple Line? Doesn't it make greater sense to try to correct the problems of what stands to be the weakest link in the system and do it in a way through the downtown and those neighborhoods that enhances the entire line, the downtown, and the community and that truly will be there for the next generation? Our Association has heard arguments that we can't "risk the project" by adding costs to the Purple Line. But if we are committed to building an infrastructure project that will last for 30 or 50 or 100 years, then isn't it important to build the best Purple Line that still meets the FTA cost-effectiveness guidelines? And isn't it a greater risk to build a Purple Line that is slow, that will be underutilized due to that lack of speed, and that will disrupt the Silver Spring redevelopment and a long-established neighborhood?

For these reasons, the Seven Oaks-Evanswood Citizens Association (SOECA) believes that it is necessary to tunnel any Purple Line through downtown Silver Spring and under Wayne Avenue for a half mile from Cedar Street to Mansfield Road.

Respectfully submitted,
Seven Oaks-Evanswood Citizens' Association (SOECA), Silver Spring
Mark Gabriele, President

- RECORD #1233 DETAIL

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Submission Content/Notes : Jonathan, J-O-N-A-T-H-A-N, Jay, J-A-Y. I am Vice President of the Seven Oaks Evanswood Citizens Association, SOECA, a county chartered association representing approximately 700 households directly to the northeast of downtown Silver Spring.

I have also been a member for the last year of Montgomery County planning board's purple line advisory group. I am speaking today on behalf of SOECA and it's President, Mark Gabrielle, who unfortunately could not be here today due to out of town business.

For most of our community, the issue is not whether, but how to do it in Silver Spring and how to do it right.

SOECA is opposed to a purple line that runs at street level on Wayne Avenue which would be the only largely residential street in the 16 miles of the purple line. We believe that for a short distance on Wayne the purple line needs to be tunneled in the same manner that most of Metro through communities and business areas through Washington, DC is tunneled.

This tunnel would need to connect with the tunnel under downtown Silver Spring, one that MTA has studied.

SOECA has a clear position on the purple line through Silver Spring. This position was developed after three years of listening to MTA presentations and an intensive fact gathering effort by the association's purple line task force, and very patient and deliberate consideration by a community that supports and uses mass transit and prides itself on that.

By an overwhelming majority vote at a standing room only meeting with three times the previous record attendance, the association voted, and I quote, "in support of a sensible mass transit solution for Silver Spring. A purple line that is not built at street level on Wayne Avenue."

The resolution advocates a tunnel under Wayne Avenue so as to avoid the significantly adverse impact the street level route will have on traffic and the neighborhoods in downtown Silver Spring.

Before that vote - Civic Association, Park Hill Citizens Association passed resolutions requesting that MTA study a tunnel under Wayne.

When MTA responded that there were engineering problems going under Sligo Creek, members of the community suggested as early as October, 2007 that MTA study a much shorter tunnel under Wayne that would exit before Sligo Creek near Mansfield Street.

When MTA finally reviewed a tunnel and dismissed it from further study after only a preliminary analysis, however there is now data from MTA to indicate that it is more than likely that there is a way to plan a hybrid route with a tunnel under Wayne that would be cost effective and increase riders and reduce travel time.

This should open the door for a dialogue among MTA, the county and the neighborhood civic associations representing the community to make a tunneling route work for this community and the downtown, and in the process improve the effectiveness of the purple line.

Given an up to \$1.6 billion transit project that is neither a Metro nor Metro light rapid transit and will take a small portion of its ridership from cars, it would be wise to rethink this segment and improve the purple line by tunneling under Wayne Avenue and downtown Silver Spring.

Otherwise, the surface route through this portion of Silver Spring will likely be the purple line's slowest segment, do little to improve transit or traffic in Silver Spring, and be a drag on the rest of the system. Let's do it right. Thanks.

- RECORD #515 DETAIL

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Submission Content/Notes : WRITTEN COMMENTS ON PURPLE LINE AA/DEIS SUBMITTED BY JONATHAN JAY, SOECA

Diane Ratliff

Director of Planning

Maryland Transit Administration

I am submitting these written comments to be included in the complete record for the public's review of the Purple Line AA/DEIS.

What follows is a somewhat longer version of the testimony I gave at MTA's November 22 public hearing at Montgomery College in Takoma Park:

I am Jonathan Jay, and I reside at 606 Woodside Parkway in Silver Spring. I am Vice President of the Seven Oaks-Evanswood Citizens Association (SOECA), a county-chartered association representing approximately 700 households directly to the northeast of downtown Silver Spring. I have also been a member for the last year of Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group. I am delivering these comments on behalf of SOECA and its President Mark Gabriele, who unfortunately could not be at the hearing due to out-of-town business.

For most of our community the issue not whether – but, rather, how to do the Purple Line right in Silver Spring. SOECA is opposed to a Purple Line that runs at surface on Wayne Avenue, which would be the only largely residential street in the 16 miles of the Purple Line. We believe that for a short distance on Wayne, for half a mile, the Purple Line needs to be tunneled, in the same manner that most of Metro through communities and business areas through Washington, DC is tunneled. This tunnel would need to connect with a tunnel under downtown Silver Spring, one that MTA has studied.

SOECA has a clear position on the Purple Line through Silver Spring. This position was developed after three years of listening to MTA presentations and an intensive fact-gathering effort by the association's Purple Line Task Force – and very patient and deliberate consideration by a community that supports and uses mass transit. By an overwhelming majority vote at a standing-room-only meeting with three times the previous record attendance, the association voted "in support of a sensible mass transit solution for Silver Spring – a Purple Line that is not built at street-level on Wayne Avenue." The resolution advocates a tunnel under Wayne Avenue so as to avoid "the significantly adverse impact a street-level route will have on traffic, the neighborhoods, and downtown Silver Spring."

Before that vote, both SOECA and its neighbor civic association, Park Hills Citizens Association, passed resolutions requesting that MTA study a tunnel under Wayne Avenue. When MTA responded that there were engineering problems with a tunnel going under Sligo Creek, members of the community suggested as early as October 2007 that MTA study a much shorter tunnel under Wayne Avenue that would exit before Sligo Creek near Mansfield Street. Yet, when MTA finally and belatedly reviewed a tunnel, it dismissed it from further study after only a preliminary analysis. However, there is now data from MTA to indicate that it is more than likely that there is a way to plan a hybrid route with a tunnel under Wayne that will be cost effective, increase riders, and reduce travel time. In fact, based on MTA figures, it would appear that a hybrid route, with a tunnel under downtown Silver Spring and Wayne Avenue so as to avoid the significantly adverse effects of this segment of the Purple Line route, can be built for less than \$1.4 billion, more than \$200 million less than the amount of the "high-investment" light rail route that MTA has studied.

The feasibility of such a route, as indicated by the new information, should open the door for a dialogue among MTA, the County, and the neighborhood civic associations representing the community so as to make a tunneling route work for this community and the downtown, and in the process improve the effectiveness of the Purple Line.

Other members of the community in testimony and written comments will discuss the adverse effects of a surface route through downtown Silver Spring and on Wayne Avenue through the community. Most of these were not even identified in the Alternatives Analysis/Draft Environmental Impact Statement, although MTA had previously discussed a number of them with representatives of the civic associations. Others will also identify errors in MTA's rejection of a full and earnest study for a short tunnel under Wayne Avenue.

Given an up to \$1.6 billion transit project that is neither Metro nor Metro-like rapid transit and will take a small portion of its ridership from cars, it would be wise to rethink this segment and improve the Purple Line by tunneling under Wayne Avenue and downtown Silver Spring. Otherwise, the surface route through this portion of Silver Spring will likely be the Purple Line's slowest segment, do little to improve transit or traffic in Silver Spring, and be a drag on the rest of the system. If the Purple Line is to be built, let's do it right.

Thank you.

Jonathan Jay

Vice President, Seven Oaks-Evanswood Citizens Association (SOECA)

Member, Montgomery County Planning Board's Purple Line Functional Master Plan Advisory Group

- RECORD #1262 DETAIL

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Submission Content/Notes : Good afternoon. My name is Jean Kavanaugh, J-E-A-N, K-A-V-A-N- A-U-G-H. I live at 9207 Wirth Avenue in Silver Spring. I am the Secretary for the Evans, Seven Oaks Evanswood Civic Association.

I am speaking today on behalf of SOECA and a majority of our community.

At a vote last spring, our association voted against an at-grade purple line down Wayne Avenue. Our association members use and support mass transit.

We support the tunneling of the purple line under Wayne Avenue. A purple line that is light rail would move slowly through congested areas of downtown Silver Spring and along the residential Wayne Avenue.

Tunneling the purple line would offer a faster route for commuters and travelers and be a sensible alternative to driving.

Wayne Avenue runs through SOECA's neighborhoods. Tunneling the purple line under Wayne Avenue would preserve the character of our neighborhood.

The purple line as a light rail system will widen large sections of Wayne Avenue, some of it to the width of Colesville Road, making it difficult for children to cross to the schools, the middle school and the elementary school, or neighbors to walk to visit each other.

A wider Wayne Avenue that comes with the light rail option would encourage more cars to use Wayne Avenue.

The drivers of these cars, however, will encounter the 180-foot trains going along the road at Wayne Avenue and try to get around them by cutting through our neighborhoods, worse than they do now, endangering pedestrians and children.

The tunneling option would eliminate the need to widen Wayne Avenue. If the light rail purple line is approved, the county can allow rezoning to higher density residences and businesses at the light rail stations in the residential areas along Wayne, well before the purple line will ever be built.

It will be difficult for our infrastructure to support high density development in our neighborhood, and it will add greatly to traffic years before we get relief of any kind of purple line.

If the purple line were underground, we would not need a purple line station at Dale Drive right in the middle of our neighborhood and our zoning would remain as it is now.

Tunneling would eliminate much of the noise pollution that comes with light rail, including the added noise with trains breaking at the station and announcements on trains at stations as trains near the station.

SOECA continues to request tunneling under Wayne Avenue as the best option for that section of the purple line. Thank you very much.

- RECORD #1057 DETAIL

First Name :	David
Last Name :	Hauck
Business Name :	Sierra Club Montgomery County Group
Address :	103 North Adams Street
City :	Rockville
State :	MD
Zip Code :	20850
Email Address :	HAUCK_D@MSN.COM
Submission Content/Notes :	<p>The Sierra Club, Montgomery County Group, would like to submit our comments on the Purple Line DEIS. They can be found in the attached document.</p> <p>Thank you.</p> <p>David Hauck Chair Sierra Club Montgomery County Group</p> <p>301-270-5826</p>
Attachments :	Purple Line DEIS SC comments 12_17_2008.pdf (48 kb)



Montgomery County Group

December 17, 2008

Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th floor
Baltimore, MD 21202

The Sierra Club Montgomery County Group supports the Purple Line as light rail between New Carrollton and Bethesda, using the Georgetown Branch right of way between Silver Spring and Bethesda. But we do not support it unconditionally.

A light rail line provides many benefits to sustainable land use and transportation for Montgomery and Prince George's County, and for the region as a whole. But it also has local environmental impacts on a valued green and recreational feature. These impacts can be minimized through careful design and construction. If MTA uses the impact reduction measures described in this letter, the Purple Line connecting four Metrorail and two MARC radial lines, will clearly yield more benefits than costs to our natural environment by promoting sustainable growth and contributing to climate protection.

Among the three light rail alternatives described in the DEIS, we believe the Medium Investment alternative maximizes benefits relative to costs. In addition, we note the following benefits of the Purple Line as light rail compared to Bus Rapid Transit (BRT):

1. Transportation. The medium investment light rail alternative provides much faster travel times than BRT between some key destinations. The rail trip from Bethesda to Silver Spring would take 9 minutes compared to 19 for even the High Investment BRT. Likewise, the rail trip from Bethesda to the University of Maryland would be 34 minutes for medium light rail, versus 49 for medium BRT. The rail travel times would rival driving times, while the BRT would not. It is often said that the Purple Line will not greatly reduce congestion on the Beltway, but these traffic model results show that a rail Purple Line would give people an attractive alternative to driving in heavy traffic.

2. Sustainable growth pattern. According to Christopher Leinberger, noted land use economist¹, extensive research shows a powerful effect of rail transit stations on the location of growth. The same effect has not been found around BRT stops. While critics are correct that the Purple Line stations would not have a significant effect on growth of the Bethesda or Silver Spring business districts, it would certainly stimulate growth in Prince George's County, from the Takoma Langley station all the way to New Carrollton. This change in the growth pattern resulting from the economic stimulus of rail stations is not captured in the traffic modeling, which always assumes the same growth pattern in all alternatives. But in practice, it would

probably increase ridership and widen the gap between the benefits of light rail versus BRT.

3. Economic justice. The Purple Line would bridge the economic divide that splits the region, separating the eastern suburbs from the prosperity of the western suburbs. Over time, the Purple Line would stimulate economic activity on the poorer side of the divide. One envisions a scenario in which the Purple Line at first provides excellent access from places like Langley Park and the University Boulevard corridor to job centers in Silver Spring, Bethesda and the I-270 Corridor. Then, the presence of a desirable work force stimulates technology and other employers to relocate or grow in Prince George's.

Prince George's County badly needs a dominant employment corridor and large urban centers such as those that have focused growth in Montgomery County. The Purple Line would provide an efficient travel route between the Red Line/I-270 Corridor (Montgomery County's economic engine) and the Green Line, which Leinberger calls Prince George's Red Line. The efficient rail connection between the corridors would stimulate growth at Green Line stations where Prince George's and its municipalities want it, including Prince George's Plaza, College Park and Greenbelt.

4. Environmental/energy impact. The higher ridership on light rail means these alternatives will provide a greater reduction in car miles driven, thus reducing the CO2 emissions. Clearly, the right of way for two light rail tracks would be narrower and more pervious to rainwater than would two road lanes for buses. The issue of relative carbon dioxide emissions from a light rail system powered by electricity generated from current power plants compared to hybrid-electric buses is less clear. But assuming that, over time, electricity is generated from wind and other renewable sources, the greater efficiency of rail over road travel will give it the edge in reducing greenhouse gas emissions.

Environmental Impacts Must be Minimized

As stated initially, we support the Purple Line assuming that the local environmental impact is minimized. Measures should go beyond providing an improved bikeway and include the following components:

1. Minimize the clearance of trees and shrubbery during construction. MTA officials have stated their intent to clear most of the Georgetown Branch right of way. They have not responded to requests to minimize the width of the cleared area, nor have they shown clearly that so much clearing is necessary.

2. Install tracks in a narrow green roadbed. We and others have asked MTA officials repeatedly to put the Purple Line tracks on a grassy roadbed. Their response has been inconsistent. An MTA slide presentation, "Prince George's and Montgomery County Briefing, July 31, 2008", seems to commit MTA to a grass roadbed. Several slides show pictures of existing green roadbeds in European light rail systems, which we assume would be models for the Purple Line. Yet the DEIS Summary picture of the Purple Line along Wayne Avenue illustrates the train on a paved bed that looks as wide as three road lanes. Numerous European light rail lines run on two closely spaced tracks with grass beneath and trees overhead. The trees make the electric poles and wires less noticeable. We have heard no reason that MTA cannot do

likewise, and we expect assurance that they will.

3. A park-like setting for track and bikeway. MTA plans to plant trees along the Purple Line, but they should do more to preserve or recreate a natural greenway for riders, cyclists and walkers. Clearing of current vegetation should be minimized. Landscaping should include a variety of native trees and other native vegetation.

4. Minimal forest clearing at crossings of Rock Creek, Sligo Creek, Long Branch, and Northwest Branch. Table 4.4-1 in Chapter 4 of the DEIS shows insignificant differences in park impacts among the various options, and the acreage of each impact is less than one acre. However small these impacts may appear, they can be made smaller by using more closely spaced tracks. Careful attention must also be paid to placing staging areas so that forest clearing not essential for the transit line itself is avoided. We note that the DEIS dismisses impacts to Rock Creek because (DEIS p. 4-21) “All of the alignments cross Rock Creek Regional Park within the County-owned Georgetown Branch right-of-way and would not require park property.” We expect very careful planning with respect to this crossing, since the construction process will have an impact on the park experience and downstream water quality.

In conclusion, we urge State officials to choose a mode and route, not on the basis of short term economy but instead on long term benefits. The DEIS makes it clear that the medium rail alternative provides the level of service that gives the inner suburbs not only a sustainable, efficient transport route, but also a connection among many rail corridors that will shape sustainable growth in all these corridors. But we also want assurance that MTA planners are as skilled and committed as their European colleagues to producing a community asset.

The Sierra Club requests the opportunity to review and comment on the detailed design of whatever Purple Line mode and route is selected with regard to the environmental concerns raised in this letter.

Sincerely,

David Hauck
Chair
Sierra Club, Montgomery County Group
301-270-5826

¹ As stated at a panel discussion on the Purple Line, Brookings Institution, 3 Dec 2008

- RECORD #1246 DETAIL

First Name :	Ravi
Last Name :	Singh
Business Name :	Silver Spring Advisors
Address :	406 Ellsworth Drive
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : My name is Ravi Singh, that's R-A-V-I, S-I-N-G-H. I live on Ellswood Drive and I'm a member of Silver Spring Advocates and SOECA. I support Alternative 7.

I support the light rail because access to sensibly designed and efficient mass transit has had a profound impact on my life and I'm sure the purple line will similarly impact the lives of many others.

I came to the U.S. 17 years ago to go to graduate school 30 miles outside Toledo, Ohio, which was also the closest source of degree-related jobs.

Living on a \$300 a month scholarship, I did not have the means to buy a car. Without a car and no mass transit, those jobs in Toledo were tantalizingly beyond my grasp.

Everyday pains like a trip to buy groceries or to shop for a pair of pants had to be carefully planned. A move to New York City changed everything.

Efficient and inexpensive subways expanded my options and allowed me to pursue and land my dream job and get a decent start in life.

Even today I value not being car dependent. In fact, one of the main reasons I live in my neighborhood is that it is within walking distance to the Metro.

One of the stated reasons for building a purple line is to help, and I quote, "a large number of people in the area who rely on transit."

There are many people living in the Langley Park area who fit this description perfectly. Many of them work two jobs to make ends meet and they travel to and from work predominantly by bus.

Imagine an individual who lives in Langley Park, say works as a nanny with a family in Bethesda and then cleans offices in Greenbelt in the evenings.

WMATA's online trip planner reveals that it would take this individual living at the intersection of University and New Hampshire and going to a home near Bethesda Metro approximately one hour to get to work in the morning, a similar amount of time to get to her second job in the evening, and 25 minutes to get home after work at 10 p.m.

That's a total of 2.5 hours of travel time presuming no traffic snafues. If this individual had access to the light rail purple line, she would get to Bethesda in 26 minutes, Greenbelt in 44 minutes and back home in 18 minutes.

That's a total of an hour and 24 minutes, a savings of 1 hour on her total commute. That's an example of how the purple line can ease the burden on someone whose life is fairly tough.

I would also like to communicate with those decision makers who are concerned with the economic crisis we find ourselves in. As an entrepreneur, I understand your concern. My business is hurting, too, and we are doing our best to reduce expenses.

Nevertheless, these tough times have also shown us that there are some key investments that we need to make so that we can emerge stronger from this crisis and be well positioned to capitalize on opportunities when the economy recovers.

Similarly in the case of Prince George's and Montgomery Counties and even for the state, the temptation to avoid investing in new transportation infrastructure may exist, but please remember that this is precisely the kind of investment that will rejuvenate the region and make it more prosperous.

I urge all the parties concerned to consider the demonstrated strong support. Remember the greater common good and make haste to break ground on this project. Thank you.

- RECORD #2810 DETAIL

First Name : Jonathan
Last Name : Elkind
Business Name : Silver Spring Advocates
Address : 415 Ellsworth Drive
City : Silver Spring
State : MD
Zip Code :
Email Address : JONELKIND@YAHOO.COM
Submission Content/Notes : Diane Ratcliff,
MTA Director of Planning,
6 St. Paul Street, 9th Floor,
Baltimore, MD 21202

Dear Ms. Ratcliff:

In November, I submitted written comments and verbal testimony in support of the Purple Line on behalf of Silver Spring Advocates, a grassroots group dedicated to supporting both our community and the Purple Line.

Since that time, a great deal of neighborhood focus has been devoted to the idea of whether the Purple Line should travel in a tunnel under downtown Silver Spring and a portion of Wayne Avenue. Some of my Silver Spring neighbors are now suggesting that both an at-grade and a tunnel alignment should be advanced to Preliminary Engineering.

Unfortunately, those who are supporting the tunnel idea have failed to acknowledge the many tradeoffs that would be involved in using a tunnel. For starters, a tunnel would involve increasing the capital cost by as much as 15% over the cost of the medium investment LRT as presented in the AA/DEIS. In addition, there would be negative impacts such as the loss of a stop at Wayne Avenue and Fenton Street, the presence of a portal on Wayne near Mansfield or Cedar, and the use of dedicated lanes for the portion of the line that would still run at grade.

The attached matrix attempts to lay out these tradeoffs in a clear manner, and I would like the matrix entered into the public comment record.

Thank you again for the MTA's efforts to move this important project forward.

Attachments : Tunnel tradeoffs dec 08.pdf (31 kb)

Silver Spring Advocates

Supporting Our Community and the Purple Line

Tradeoffs: Purple Line Alignment on Wayne Avenue

Wayne Avenue is considered to be the likely path of the Purple Line through eastern Silver Spring. Despite the fact that many other metropolitan areas have successfully operated at-grade light rail systems, some Silver Spring neighbors have suggested that the community's interests would be served best by having the line run partially underground. The tunnel segment would travel under Silver Spring Avenue and Grove Street and then return to street level on Wayne, either near Cedar Street or Mansfield Road.

Using a tunnel would involve serious tradeoffs for our community. The negative impacts from a tunnel appear likely to dwarf those from an at-grade routing. This table summarizes the tradeoffs involved in the choice of an at-grade or tunnel routing through Silver Spring.

Issue	At-Grade Alignment	Tunnel to Cedar or Mansfield
Traffic – on Wayne Avenue and surrounding streets	+	-
	With <u>shared</u> lanes and left-turn lanes, most signalized intersections along Wayne would have same level of service (LOS) as currently is the case; some would have slightly <i>better</i> LOS with Purple Line. One exception to this would be the Wayne-Fenton intersection, which would have worse LOS during the afternoon rush. Spillover traffic is not projected to be significant. (Findings are from MTA traffic study.)	A portion of Wayne Avenue would have <u>dedicated</u> transit lanes (from the portal at Cedar or Mansfield to the point where the Plymouth Street tunnel starts, halfway up Wayne toward Flower). In addition, the portal at Cedar or Mansfield, by occupying two traffic lanes, would create a major bottleneck for all traffic on Wayne. Accordingly, this portion of Wayne Avenue would almost certainly have serious traffic impacts, e.g., rush hour back-ups extending well beyond the immediate area where the dedicated lanes are located, and spillover traffic in the neighborhood.
Widening and disruption of Wayne Avenue	-	-
	Potential for widening of much of Wayne Avenue (between Fenton and Sligo Creek) due to creation of left-turn lanes. However, a substantial portion of the widening would be negligible in actual amount (left-turn lane tapering areas) and, in addition, a substantial portion would involve the unused grassy area of the SSIMS school property, not private property. Nonetheless, no resident appreciates losing some of what feels like his/her front yard (even though some of that yard formally belongs to the County).	Would require major widening for the segment where the portal is located (even though Wayne would apparently be reduced to one lane in each direction). The portal opening and walls would be roughly 36 feet across, with a tunnel opening roughly 15 feet in height. It would continue for several hundred feet in length, until the point at which the transitway reaches street level from underground. Residents living adjacent to the portal would be unable to turn into driveways from the far side of the street. (See next page for construction-related impacts.) Opponents of the Purple Line have argued that portals close to schools would be a safety challenge.
Serving the local community	+	-
	Would provide <u>a stop at Wayne Avenue and Fenton Street</u> , enabling people to more easily avoid using their cars to shop, dine, and use entertainment sites and the new library in downtown Silver Spring, as well as Fenton Village. In addition, <u>a stop at Dale Drive</u> , which is favored by some residents, would be possible.	Would <u>not</u> allow a stop at Fenton Street (or Dale Drive) because of the cost of underground stations. Businesses in downtown Silver Spring and the Fenton Village area would not receive as much foot traffic as they would if there were a Fenton Street stop. Many more customers would drive, adding to our local traffic problems. Without local stops, Silver Spring gets less benefit of having the Purple Line in our neighborhood.

Capital cost	<p style="text-align: center;">+</p> <p>At-grade would avoid \$110-175 million of additional capital cost associated with tunnel to Cedar or Mansfield (per Planning Board staff memo).</p>	<p style="text-align: center;">-</p> <p>Tunnel to Cedar would have a capital cost of roughly \$110 million more than at-grade (9% increase). Tunnel to Mansfield would cost roughly \$175 million more than at-grade (15% increase).</p>
"Cost effectiveness"	<p style="text-align: center;">+/-</p> <p>Tunnel and at-grade alignments appear to have roughly similar "cost effectiveness" ratings (a calculation based on capital and operating costs, ridership and travel time saved).</p>	<p style="text-align: center;">+/-</p> <p>Tunnel and at-grade alignments appear to have roughly similar "cost effectiveness" ratings (a calculation based on capital and operating costs, ridership and travel time saved).</p>
Travel time	<p style="text-align: center;">-</p> <p>At-grade alignment would pass through Silver Spring somewhat more slowly, in large part because the at-grade alignment would use shared lanes on Wayne and could have stops at Fenton-Wayne and possibly at Dale-Wayne.</p>	<p style="text-align: center;">+</p> <p>As a result of having no stops and dedicated lanes (which will create traffic problems in our neighborhood), a tunnel alignment would pass through Silver Spring slightly more quickly. Paradoxically, this is <i>a benefit for those from outside Silver Spring who are transiting it</i> – not a benefit for our community.</p>
Ridership	<p style="text-align: center;">-</p> <p>As a result of the slightly slower travel time through Silver Spring, MTA estimates that the at-grade option would attract slightly fewer users than tunnel alignment.</p>	<p style="text-align: center;">+</p> <p>As a result of the faster travel time through Silver Spring, MTA estimates that the tunnel to Cedar would attract 2100 more trips per average workday (only a 3.3% increase over at-grade).</p>
Construction impacts	<p style="text-align: center;">+</p> <p>Construction impacts would be limited to Wayne Avenue and Bonifant Street.</p> <p>Construction would require reconstruction of the roadbed to allow installation of shared transit lanes (and a stop at Dale, if ultimately built), plus a replacement bridge at Sligo Creek.</p>	<p style="text-align: center;">-</p> <p>Construction impacts would include a significant portion of what is involved for an at-grade alignment (though a shorter stretch of Wayne and none of Bonifant).</p> <p><i>In addition</i>, the tunnel would involve construction impacts that extend across a much wider swath of downtown and east Silver Spring, probably lasting for two and a half or three years:</p> <ul style="list-style-type: none"> • The tunnel segment would be a machine-bored tunnel, according to MTA. This means that there would need to be a large area excavated (probably at the portal location) to allow assembly and "launching" of the boring machine and the removal of soil and rock. • The tunneling raises concerns about impacts on existing homes, especially those along Grove Street, and those on the portion of Bonifant and Wayne that the tunnel would pass underneath. • The portal at either Cedar or Mansfield would be a massive hole in the center of the roadway; Wayne Avenue would likely be closed for several years during construction.

- RECORD #1241 DETAIL

First Name :	Jonathan
Last Name :	Elkind
Business Name :	Silver Spring Advocates
Address :	415 Ellsworth Drive
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : My name is Jonathan Elkind, that's J-O-N-A-T-H-A-N, last name E-L- K-I-N-D.

I have been a homeowner in Silver Spring for nearly 18 years. I work as an Energy and Environment Consultant and as a non-residence senior fellow at the Brookings Institution in Washington, DC.

I'm a member of the Seven Oaks Evanswood Citizens Association and I'm a Chairperson of a grass roots group called Silver Spring Advocates, which is over 100 members.

I strongly support a light rail purple line and I hope the line will be built and built well, built soon and built right near my home.

Residents of the Maryland suburbs need the purple line for a reason that we can see with our own eyes. We are drowning in traffic and that means air pollution, water pollution, waste of lives and energy and a threat to our global climate.

Unless people have better transportation choices, this reality will simply go unchanged.

A broken global climate is not a legacy that I wish to leave to my three children, nor is a damaged neighborhood.

Having studied the MTA proposals intensively, including with my civic association's purple line task force, I find it stunning to hear today so many of the same myths and misinformation that have circulated in our neighborhood for months.

Let's look at the purple line. It's about mobility, community and access. Today many residents of Silver Spring work in Bethesda or College Park as I did a few years ago.

For me, getting back and forth required long and time wasting Metro rail routings or buses that ran infrequently and never reliably.

Purple line is also about stronger, better communities. Families that are well served by transit spend on average only 9 percent of their household income on transportation. Families in car-dependent suburbs spend 25 percent.

Poor families get hit much harder than the average. Neighborhoods served by light rail systems experience increased home values. A recent annual real estate survey noted that homes close to good mass transit systems are holding their value better than homes in areas that lack good transit even in today's terrible market.

In Denver, light rail served communities have commanded a 15 to 20 percent premium over other nearby houses.

The purple line is about access. As much as we in East Silver Spring would benefit directly from having the purple line through our neighborhood, transit dependent neighbors in lower income areas like Langley Park would benefit even more.

Some critics say that the purple line must not be built because it could result in higher rents in low income neighborhoods. That's ridiculous logic.

Our region definitely needs good, safe, affordable housing with good services. Housing affordability should not be an excuse to obstruct better

transit service for all. It's time to get the purple line built and give people along this entire 16-mile corridor new choices for how they travel.

Thank you for the opportunity to make comments today.

- RECORD #1274 DETAIL

First Name : Irving
Last Name : Mintzer
Business Name : Silver Spring Advocates
Address : 9514 Garwood Street
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : My name is Irving Mintzer, it's I-R-V-I-N-G, my family name is M-I-N-T-Z-E-R. I live at 9514 Garwood Street in Silver Spring where I have lived with my wife and family for 22 years.

I am a senior advisor to the Potomac Energy Fund and an advisor to the U.S. Department of Energy on energy, environment and security issues.

I'm a member of the Silver Spring Advocates and I come here today to speak to you about the importance of encouraging a rapid implementation of the immediate investment alternative of the light rail purple line.

Like many here in Montgomery county and throughout Maryland, I have a strong emotional commitment to the importance of a sustainable environment and an economy that's based on good jobs for Americans.

The light rail alternative to the purple line provides a unique opportunity to promote both good jobs that will pay good salaries to Americans here while building the foundation for a lasting and sustainable economy and a strong and well protected environment.

By investing now in a light rail transit system for Montgomery County, we will position the county for providing high quality transportation services with minimal negative impacts on the environment for decades to come.

Because this variant is electric powered, as the county and the state move to a higher dependence on renewable sources of energy, we won't have to rebuild our transit structure to address the future consequences of fossil fuel use.

By choosing the medium variant of the light rail option for the purple line, we recognize the complex challenges that will face us as a county and as a state in the context of the current financial turbulence in world markets.

It is an alternative that can be built at a manageable price that has a high cost benefit ratio and that will provide a basis for uniting our community and our county with our friends and colleagues in Prince Georges now and for many years to come.

I urge you to look at this alternative favorably, not to get lost in the weeds of the lengths of the left turn lanes or the number of feet of new curbing you have to build, but to think of it in the context of building the kind of infrastructure that our incoming president elect has talked about, an infrastructure that will provide the basis for a strong economy, provide jobs that can't be exported and make our environment an important, positive legacy for our children and grandchildren. Thank you.

- RECORD #2688 DETAIL

First Name : Darian
Last Name : Unger
Business Name : Silver Spring Citizens Advisory Board
Address :
City :
State : MD
Zip Code :
Email Address : DARIANUNGER@YAHOO.COM

Submission Content/Notes : Dear Ms. Ratcliff,

Last night, the Silver Spring Citizens Advisory Board unanimously adopted the attached letter, which was written after months of community and MTA meetings about the proposed Purple Line. The text of the letter is also included below, and a hard copy will be sent by regular mail also.

Our board represents the residents of downtown Silver Spring and its neighboring communities. Thank you very much for including our opinion regarding the Purple Line.

Silver Spring Citizens Advisory Board
Silver Spring Regional Center?
8435 Georgia Avenue
Silver Spring, Maryland 20910

Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

We, the undersigned members of the Silver Spring Citizens Advisory Board, write today to express our unequivocal support for the construction of the Purple Line. By creating an east-west transit project that links communities such as Bethesda, Silver Spring, Langley Park, and College Park, the Purple Line will catalyze continued economic development in each of these communities, ease access to job opportunities throughout this corridor, support transit-oriented development objectives and help to combat continued sprawl, and support the environmental conservation objectives that are the shared values of our Board and indeed of our community. The development of an east-west, suburb-to-suburb link in this corridor that would connect existing spokes of the Metrorail, MARC and Amtrak systems is long overdue and we believe that the State should move to advance the Purple Line through the federal planning and funding processes as quickly as possible.

We want to emphasize the critical need to build the best possible alignment from the start, therefore, the Purple Line should be constructed as a light rail transit system. The advantages of Light Rail Transit (LRT) over Bus Rapid Transit (BRT) include attracting more riders, shorter travel times, shift more automobile trips to transit and therefore would offer a greater reduction of automobile generated air pollution in the corridor, do more to meet accessibility and mobility objectives and would provide the greatest user benefits. According to the Draft Environmental Impact Statement (DEIS), comparing Medium LRT to Medium BRT would generate 62,600 daily boardings compared to 51,800, provide a 9 minute ride compared to 19 minutes from Bethesda to Silver Spring, and provide 19,200 new trips to transit relative to the No Build Alternative, compared to 15,300.

Finally, we encourage the Maryland Transit Administration (MTA), state and county officials to ensure that this project study and evaluate as much tunneling in Silver Spring as is practicable and as can be accommodated without rendering the project uncompetitive under cost effectiveness criteria or reducing the utility of the project. We feel that if done correctly, without limiting user benefit or adding undue impacts to communities, tunneling could offer significant opportunities to move the Purple Line faster through congested areas and neighborhoods to

reduce impacts on traffic, local communities, residential properties and facilities.

As the project moves forward, we strongly encourage the MTA to continue to work to identify and to detail to the communities through which the alignments under consideration would pass the full impacts of these alignments. We are concerned that the DEIS now under consideration is insufficient in its treatment of the impacts of alignments on residential properties and community facilities and amenities – particularly because it does not provide close analysis of the extent of street widening that the various alignments would require -- and we hope that environmental and other impacts on Silver Spring communities and resources such as Sligo Creek Park and the Capital Crescent Trail will be minimized.

We thank you and the staff of the MTA for the work that has been conducted to date on the Purple Line project and stand ready to assist with the continued development of this project in any way possible. We stand ready to assist in working together to maximize the benefits and minimize the impacts to downtown Silver Spring and its many communities that will be served by Purple Line light rail.

Sincerely,

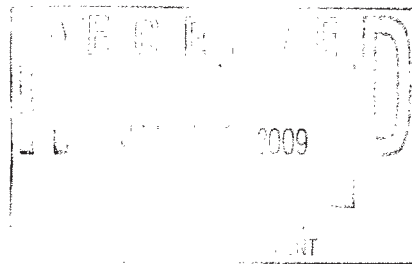
Darian Unger
Chairman, Silver Spring Citizens Advisory Board
Silver Spring Citizens Advisory Board.pdf (83 kb)

Attachments :



SILVER SPRING CITIZENS ADVISORY BOARD

January 13, 2009



Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

We, the undersigned members of the Silver Spring Citizens Advisory Board, write today to express our unequivocal support for the construction of the Purple Line. By creating an east-west transit project that links communities such as Bethesda, Silver Spring, Langley Park, and College Park, the Purple Line will catalyze continued economic development in each of these communities, ease access to job opportunities throughout this corridor, support transit-oriented development objectives and help to combat continued sprawl, and support the environmental conservation objectives that are the shared values of our Board and indeed of our community. The development of an east-west, suburb-to-suburb link in this corridor that would connect existing spokes of the Metrorail, MARC and Amtrak systems is long overdue and we believe that the State should move to advance the Purple Line through the federal planning and funding processes as quickly as possible.

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Ms. Ratcliff
January 13, 2009
Page 2

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We thank you and the staff of the MTA for the work that has been conducted to date on the Purple Line project and stand ready to assist with the continued development of this project in any way possible. We stand ready to assist in working together to maximize the benefits and minimize the impacts to downtown Silver Spring and its many communities that will be served by Purple Line light rail.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Unger', written over the word 'Sincerely,'.

Darian Unger
Chairman

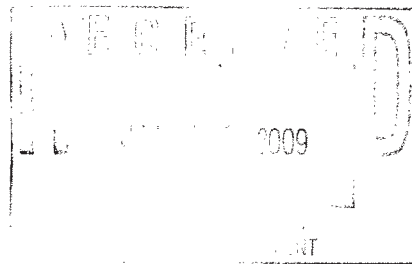
- RECORD #2109 DETAIL

First Name : Darian
Last Name : Unger
Business Name : Silver Spring Citizens Advisory Board
Address : 8435 Georgia Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :
Submission Content/Notes :
Attachments : Silver Spring Citizens Advisory Board.pdf (83 kb)



SILVER SPRING CITIZENS ADVISORY BOARD

January 13, 2009



Ms. Diane Ratcliff
MTA Director of Planning
6 St. Paul Street, 9th Floor
Baltimore, MD 21202

Dear Ms. Ratcliff:

We, the undersigned members of the Silver Spring Citizens Advisory Board, write today to express our unequivocal support for the construction of the Purple Line. By creating an east-west transit project that links communities such as Bethesda, Silver Spring, Langley Park, and College Park, the Purple Line will catalyze continued economic development in each of these communities, ease access to job opportunities throughout this corridor, support transit-oriented development objectives and help to combat continued sprawl, and support the environmental conservation objectives that are the shared values of our Board and indeed of our community. The development of an east-west, suburb-to-suburb link in this corridor that would connect existing spokes of the Metrorail, MARC and Amtrak systems is long overdue and we believe that the State should move to advance the Purple Line through the federal planning and funding processes as quickly as possible.

We want to emphasize the critical need to build the best possible alignment from the start, therefore, the Purple Line should be constructed as a light rail transit system. The advantages of Light Rail Transit (LRT) over Bus Rapid Transit (BRT) include attracting more riders, shorter travel times, shift more automobile trips to transit and therefore would offer a greater reduction of automobile generated air pollution in the corridor, do more to meet accessibility and mobility objectives and would provide the greatest user benefits. According to the Draft Environmental Impact Statement (DEIS), comparing Medium LRT to Medium BRT would generate 62,600 daily boardings compared to 51,800, provide a 9 minute ride compared to 19 minutes from Bethesda to Silver Spring, and provide 19,200 new trips to transit relative to the No Build Alternative, compared to 15,300.

Finally, we encourage the Maryland Transit Administration (MTA), state and county officials to ensure that this project study and evaluate as much tunneling in Silver Spring as is practicable and as can be accommodated without rendering the project uncompetitive under cost effectiveness criteria or reducing the utility of the project. We feel that if done correctly, without

Ms. Ratcliff
January 13, 2009
Page 2

limiting user benefit or adding undue impacts to communities, tunneling could offer significant opportunities to move the Purple Line faster through congested areas and neighborhoods to reduce impacts on traffic, local communities, residential properties and facilities.

As the project moves forward, we strongly encourage the MTA to continue to work to identify and to detail to the communities through which the alignments under consideration would pass the full impacts of these alignments. We are concerned that the DEIS now under consideration is insufficient in its treatment of the impacts of alignments on residential properties and community facilities and amenities – particularly because it does not provide close analysis of the extent of street widening that the various alignments would require -- and we hope that environmental and other impacts on Silver Spring communities and resources such as Sligo Creek Park and the Capital Crescent Trail will be minimized.

We thank you and the staff of the MTA for the work that has been conducted to date on the Purple Line project and stand ready to assist with the continued development of this project in any way possible. We stand ready to assist in working together to maximize the benefits and minimize the impacts to downtown Silver Spring and its many communities that will be served by Purple Line light rail.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Unger', written over the word 'Sincerely,'.

Darian Unger
Chairman

- RECORD #2339 DETAIL

First Name : Jon
Last Name : Lourie
Business Name : Silver Spring Urban District Advisory Committee
Address : 8435 Georgia Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :
Submission Content/Notes :
Attachments : SS Urban District Advisory Committee.pdf (126 kb)



SILVER SPRING URBAN DISTRICT ADVISORY COMMITTEE

December 8, 2008

The Honorable Martin O'Malley
Governor, State of Maryland
100 State Circle
Annapolis, MD 21401-1925

Dear Mr. O'Malley:

The Silver Spring Urban District Advisory Committee has been monitoring the efforts of the Maryland Transit Administration (MTA) to develop plans for a Purple Line that will provide transit services from Bethesda to New Carrollton passing through downtown Silver Spring. We have had several briefings by MTA. **The SSUDAC is strongly in support of the Medium Investment Light Rail (LRT).**

The Purple Line with the LRT option would do more for the future of downtown Silver Spring and the Silver Spring community by:

- Increasing ridership;
- Providing positive economic development impact;
- Enhancing access to downtown Silver Spring;
- Providing greater connectivity to the region and important destinations such as downtown Bethesda and the University of Maryland;
- Significantly reducing future traffic in downtown Silver Spring;
- Reducing vehicular emissions and providing a green alternative to buses;
- Providing the most cost effective option; and
- Greater transit capacity.

The Medium Investment Option will allow for stations to be located in and close to downtown Silver Spring. In particular, a station at the new Silver Spring Library site would provide access to both the core area of downtown as well as the Fenton Village area to the south, encouraging the redevelopment of this area. The High Option with its expensive underground tunnels and limited stations would bypass downtown Silver Spring.

Mr. O'Malley
December 8, 2008
Page 2

The Silver Spring Urban District Advisory Committee would respectfully encourage you to chose the Medium Investment LRT option as the locally preferred alternative and do everything to help move this transit project forward. It is critical to the future of Silver Spring, Montgomery County and the State of Maryland.

Sincerely,



Jon Lourie
Chair

cc:
Isiah Leggett, Montgomery County Executive
John D. Porcari, Maryland Secretary of Transportation
Mike Madden, Maryland Transit Administration

- RECORD #1164 DETAIL

First Name : Jorge

Last Name : Sactic

Business Name : Small Businesses in Langley Park

Address : 1401 University Boulevard

City : Hyattsville

State : MD

Zip Code : 20783

Email Address :

Submission Content/Notes : Good evening. My name is Jorge Sactic. George, J-O-R-G-E, last name Sactic, S-A-C-T-I-C.

I'm here representing the small businesses of the Langley Park area. Currently I am the (inaudible) Association of (inaudible) located on University Boulevard between Riggs and New Hampshire Avenue.

We are the ones to (inaudible) about the new changes that (inaudible) to the community. We consider the new cosmetic changes that will take place will increase housing and it will be (inaudible) to afford.

Small businesses are concerned because (inaudible) away from the area because of the high cost and then (inaudible) because they are our customers. So basically my area of business is established in this area for those items (inaudible) that is specific served this community.

So we would like to know if within your program you can include prohibitions to include us, both community and small business. It is (inaudible) for us.

What I can tell you is that members of the community and members of the small businesses are very worried about it. We note that the corporations are going to be present in the area.

We feel that we have been in the area for many years in a county we should have been (inaudible) we have been paying taxes, the community has been (inaudible) on these businesses, not only minority business but (inaudible) and we have been here for so long (inaudible) we are still hanging n there. I think that (inaudible) positive and (inaudible) just come in and drive us away. So that's (inaudible) I hope you take that into consideration. Thank you very much.

- RECORD #1259 DETAIL

First Name : Evan
Last Name : Glass
Business Name : South Silver Spring Neighborhood Association
Address : 7915 Eastern Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address :

Submission Content/Notes : My name is Evan Glass, E-V-A-N, G-L-A-S-S. I am President of the South Silver Spring Neighborhood Association located right across the street, Georgia Avenue, a stone's throw distance from here.

We are a burgeoning community that embraces smart growth principle. Most of us take the Metro rail and Metro buses to work, mostly in Washington, DC and those, my neighbors who drive, basically do so on the east/west corridor, mainly from Bethesda to College Park. A future purple line would help get them off the roads as well.

We have heard the facts over the last few hours as to why we need a purple line and many people have stated that they prefer the light rail line.

I think the most important factor we need to look at here is the expected ridership numbers and the time it takes to travel on this purple line.

What we need to do and what we should do is get most people out of their vehicles and I think the light rail option does that the best.

We cannot forget the history of transportation decisions in the Washington, DC area. There has been an over-reliance on automobiles and communities successfully fight in Metro rail stations more than 25 years ago, and now they are saddled in traffic. We cannot repeat these decisions.

Basically environmental and socioeconomic benefits are clear that we need a purple line for a myriad of reasons. But again, the goal that we should be looking at and striving for is to help get people moving throughout our communities, Prince George's County, Montgomery County and the larger DC area, and to help reduce vehicular traffic.

The studies that have been provided show that the light rail options do that the best. Thank you.

- RECORD #762 DETAIL

First Name : Rachel
Last Name : Sylvan
Business Name : South Silver Spring Neighborhood Association
Address : 7981 Eastern Avenue
City : Silver Spring
State : MD
Zip Code : 20910
Email Address : rfsylvan@gmail.com
Submission Content/Notes : Dear Mr. Madden,

I strongly encourage MTA to do everything it can to build the Light Rail Purple Line as soon as possible.

Thank you.

Rachel Fineberg Sylvan

- RECORD #1161 DETAIL

First Name :	Robert
Last Name :	Rosenberg
Business Name :	SSTOP
Address :	741 Silver Spring Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Robert Rosenberg, R-O-B-E-R-T, R-O-S-E-N-B-E-R-G. Hello, everyone. My name is Robert Rosenberg, and I'm a founding member of SSTOP, the community advocacy group representing the concerns of East Silver Spring residents who are impacted by the Silver Spring/Thayer Avenue alignment.

For full disclosure, I'm also a member of the Purple Line Montgomery County Master Plan Advisory Group, though I'm not here to speak on behalf of this organization.

My mission today is to make clear and make sure that the problems and concerns of the Silver Spring, the residents that are impacted by the Silver Spring/Thayer Avenue alignment are put into the record.

It is important to have a little bit of historical context as to the selection of the Silver Spring/Thayer Avenue alignment. The basis for its consideration was a misnomer.

The original alignments of Sligo and Wayne Avenue were meeting resistance in the MTA incorrectly assumed right-of-way existed on the private properties between Silver Spring and Thayer Avenue where the alignment was placed.

There was no right-of-way at the time then and there is no right-of-way now. The momentum created by this misunderstanding and the need for another alternative led to this alignment.

Therefore, this alignment was never based on an accurate fact base and/or the efficacy of the route. All this has done is created a red herring that has threatened to damage the community and if selected would result in the largest number of individual lot takings of any of the alignments through East Silver Spring.

According to the DEIS, this alignment would also result in the most significant impacts of any of the Silver Spring alignments.

This fact has been openly discussed by members of the MTA. Not only in terms of the taking of private properties, but also by far the largest amount of public parkland.

Interestingly, the parkland that would be taken has blossomed over the last few years through a unique partnership between the local community and county.

The county has invested a significant amount of money over the last year in this effort, all of which would be wasted if this alignment was implemented.

Other impacts caused by this alignment would include a destructive fly over and a tunnel portal opening up right at East Silver Spring Elementary School in front of a crossing where there are approximately 75 daily children crossings.

I would also like to point out that the Silver Spring/Thayer Avenue alignment has been either woefully understudied relative to the other alignments or the information has not been fully presented in the DEIS.

Unlike for the other alignments, key issues such as station to station travel times, daily boardings, key peak hour intersection levels and noise analyses are not discussed for the Silver Spring/Thayer Avenue alignment.

For the MTA to even remotely consider using the Silver Spring/Thayer Avenue as a serious alternative or even as a design option, these analyses as well as others must be fully completed with a public comment period.

More details will be submitted in writing. Thank you.

- RECORD #665 DETAIL

First Name : Neal
Last Name : Teague
Business Name : Takoma/Langley Crossroads Development Authority
Address :
City :
State : MD
Zip Code :
Email Address :
Submission Content/Notes :
Attachments : PurpleLineTestimonyNovember22.teague.pdf (10 kb)

Purple Line Testimony – November 22, 2008
Speaker #25

My name is Neel Teague and I am President of the Takoma/Langley Crossroads Development Authority, a business association.

The CDA represents the 175 businesses and property owners in Takoma Park at the intersection of University Boulevard and New Hampshire Avenue.

Our organization works closely with the businesses and property owners in the larger area known as Maryland's International Corridor, from Long Branch in Montgomery County to our neighbors in Prince George's County right at the T/L Crossroads, and on to University and Riggs and the Univ of Maryland.

Our businesses serve the vibrant international community in the Takoma/Langley Crossroads and also offer specialized goods and services that attract customers from throughout the region.

The CDA strongly supports the medium light rail option for the Purple Line with planned stations at University Boulevard and New Hampshire Avenue and at University Boulevard and Riggs Road.

The Takoma/Langley Crossroads sits at the border between Montgomery and Prince George's counties (and Takoma Park) and is a vital link between the counties. This link will be greatly reinforced by the improved east/west access that medium LRT will bring.

Our customers and employees in the surrounding residential communities are already heavy transit users and we have no doubt that they will embrace the superior service that LRT can offer. They need the improved access that LRT will bring to enable them to get to jobs and education so they can continue to improve their lives and their economic prospects right here in their community.

Most of the properties in the area were developed between 40 and 60 years ago when this area was the outer edge of suburban growth and America's post-World War II romance with the automobile was just beginning. While still economically viable, these properties are nearing the end of their useful life and will be ready for redevelopment soon.

The CDA has supported improvements that make an otherwise automobile-oriented area more pedestrian and transit friendly, including:

- decorative sidewalk paving and crosswalks
- bus shelters and benches
- most recently \$7 million in pedestrian safety improvements including signals, crosswalks, and median fencing;

- the proposed Takoma/Langley Transit Center;

however, none of these have changed the fundamental automobile-oriented character of the current development pattern. LRT has the potential to do that - BRT does not.

Our property owners and businesses have embraced the possibilities of redevelopment in Transit Oriented Development that the Purple Line could stimulate. We are working closely with MTA and MNCPPC Sector Planning teams to develop new Sector Plans for the future that could take full advantage of the additional customers that the Purple Line would bring, while maintaining the viability of existing improvements until redevelopment occurs.

In our judgment, only medium LRT offers the possibility of stimulating this kind of redevelopment. BRT will not bring enough additional ridership to support redevelopment in TOD – too few riders, too many cars. Also, the improved tax base from higher density redevelopment will generate a return on the increased investment in LRT versus BRT.

In summary, construction of the Purple Line in the medium LRT option is an historic opportunity to renew and revitalize a developed suburban community rather than consigning it to a cycle of decline and inducing more loss of open space to continued urban sprawl.

We urge the State of Maryland to choose the medium light rail alternative and proceed with full funding and construction from Bethesda to New Carrollton as soon as possible. We look forward to the working the transportation and planning agencies to make this project a reality.

Thank you.

- RECORD #1248 DETAIL

First Name :	Neel
Last Name :	Teague, President
Business Name :	Takoma/ LangleyPark Crossroads Dev Auth Incorporated
Address :	7676 New Hampshire Drive
City :	Takoma Park
State :	MD
Zip Code :	20912
Email Address :	

Submission Content/Notes : Neel Teague, that's N-E- E-L, T-E-A-G-U-E. My name is Neel Teague. I am President of the Takoma Langley Crossroads Development Authority, a business association.

The CDA represents 175 businesses and property owners in Takoma Park at the intersection of University Boulevard and New Hampshire Avenue.

Our organization works closely with the businesses and property owners in the larger area known as Maryland's International Corridor from Long Branch in Montgomery County to our neighbors in Prince George's County right up the Takoma Langley Crossroads and onto University and Riggs and the University of Maryland.

Our businesses serve a vibrant international community in the Takoma/Langley Crossroads and also offers specialized goods and services that attract customers from throughout the region.

The CDA strongly supports the medium light rail option for the purple line with stops at the New Hampshire and University Boulevard intersections and the Riggs Road at University Boulevard intersections.

The Takoma/Langley Crossroads sits at the border of Montgomery County and Prince George's County and Takoma Park and is a vital link between the counties.

This link will be greatly reinforced by the improved east/west access that medium light rail will bring.

Our customers and employees in the surrounding residential communities are already heavy transit users and we have no doubt they will embrace the superior service that light rail transit can offer.

They need the improved access that LRT will bring to enable them to get to jobs and education so that they can continue to improve their prospects and their lives right here in their own community.

Most of the properties in the area were developed between 40 and 60 years ago when this area was the outer edge of suburban growth and the post World War II romance with the automobile was just beginning.

While economically viable, these properties are near the end of their useful life and will be ready for redevelopment soon.

The CDA has supported improvements that make an otherwise automobile oriented area more pedestrian and transit friendly, including decorative sidewalk paving and crosswalks, bus shelters and benches. Most recently a \$7 million pedestrian safety improvement program including signals, cross rocks and medium fencing in the proposed Takoma/Langley transit center.

However, none of these will have, have changed the fundamental automobile oriented character of the crossroads that LRT has the potential to do and bus rapid transit does not have the potential to do.

Our property owners and businesses embrace the possibilities of redevelopment and transit oriented development that the purple line could stimulate. We are working closely with MTA and Park and Planning sector planning teams to develop sector plans for the future that could take full advantage of additional customers that the purple line could bring.

In our judgement, only medium light rail transit offers the possibility of simulating this kind of development. BRT will not bring enough additional ridership to support redevelopment. Too few riders and too many cars.

In summary, construction of the purple line in the medium light rail transit option is an historic opportunity to renew and revitalize the developed suburban community rather than consigning it to a cycle of decline and inducing more loss of open space to continue urban sprawl. Thank you very much.

- RECORD #1750 DETAIL

First Name :	Neel
Last Name :	Teague
Business Name :	Takoma/Langley Crossroads Development Authority, Inc.,
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	NTEAGUE@STOUTANDTEAGUE.COM

Submission Content/Notes : Ms. Diane Ratcliff, Director of Planning
Maryland Transit Administration

Dear Ms Ratcliff:

Ever since former Governor Parris Glendinning came to the Crossroads to announce the intent to build a Purple Line, the Takoma/Langley Crossroads Development Authority, Inc., (CDA) has fully and enthusiastically supported the idea, knowing that this would not only provide better transportation for the many immigrant families and other workers in this area, but that it would also bring revitalization, badly needed.

The CDA is a business association of 158 property owners and business tenants, located in the tri-jurisdictional intersection of New Hampshire Avenue and University Boulevard. The CDA Operating Board, representing these 158 properties and businesses, has on numerous occasions not only voiced its support for the idea of a medium Light Rail Purple Line using the Master Plan alignment, but has voted this support and has sent letters on more than one occasion to those who make decisions about the possibility of a Purple Line.

This area has an existing base of transit users that will embrace the improved mass transit service that the Purple Line will bring. MTA has already recognized this need in calling for a Transit Center to be located in the Crossroads and funded by contributions from the State, and both Montgomery and Prince George's counties.

If the following planning staff conclusions sound familiar, it is because we and many others support them and they are:

- We support the Purple Line with a major stop in the Crossroads at the intersection of University Boulevard and New Hampshire Avenue, preferably in connection with the proposed Transit Center.
- Only light rail, not bus rapid transit, can carry the heavy passenger loads foreseen.
- Only light rail can support the passenger loads envisioned in the Master Plan revision now under consideration; with appropriate planning and zoning tools to allow for the densities needed stimulate the revitalization of aging commercial properties in the Crossroads.

- The taking of right of way should be minimized to ensure the continued viability of existing properties and businesses.
- It is essential that the Purple Line use the Georgetown Branch alignment between Bethesda and Silver Spring.
- Complete the hiker-biker trail as part of the project, including parallel routes in Bethesda through the Air Rights Tunnel and on Bethesda and Willow Avenues and along an off-road corridor along the CSX right-of-way into the Silver Spring Transit Center, then aim for a 12 foot trail width wherever feasible, since a trail along the tramway will be as popular as the trail west of Bethesda.
- We also support the expedited construction of the Bethesda South Entrance as a priority infrastructure project under the Stimulus program being developed by the incoming Obama administration.

Please encourage Governor O'Malley to get the Light Rail Purple Line into construction on the fastest timeline.

We thank you for considering the opinions of the 158 members of the CDA.

G. Neel Teague,
President

- RECORD #1132 DETAIL

First Name : Sharon
Last Name : Wertz
Business Name : Templeton Knolls Civic Assoc
Address : 5512 Carters Lane
City : Riverdale
State : MD
Zip Code : 20737
Email Address :

Submission Content/Notes : It's S-H-A-R-O-N and it's W-E-R-T-Z. My name is Sharon Wertz. I live at 5512 Carters Lane in Riverdale and I'm with the Templeton Knolls Civic Association. We're 400 homes in behind Riverdale Plaza, which Riverdale Plaza is on Riverdale Road.

We are in support, at Templeton Knolls, of the proposed Purple Line. We don't think today the bus system alone is enough for our citizens today. We feel that this new system being offered to all the citizens there, will offer safer travel and make a real difference in family life.

Think about it. As a mom or a dad may be able to take his or her child to a bus stop before school and than still get to work on time. Have breakfast or whatever.

But one of things that we feel the proposed rail line will be an integral part of the already planned revitalization of the Kenilworth Avenue Corridor. And if I may jump on what Senator Pinsky said in his statement, I would like you to look at the option there on Kenilworth Avenue as it goes up Riverdale Road to New Carrollton. That it be on the high-end, that the High-End Option would be there for this Inner Beltway community, that we go up and over.

We have a much used foot travel path there. We have buses going back and forth. Schools across that corridor and I come through that area in the evenings in my travel every day on the way home from work. I would really like the high-end to be looked at at that particular location, Kenilworth and East West Highway.

Thank you and it's really exciting times and I encourage leadership in the community to think about as this Purple Line could possibly come in. Think about where you're going to put your community centers. Think about your child. They may be able to go to an event if you have community centers planned in and around these areas. So thank you very much.

- RECORD #1695 DETAIL

First Name :	Joy C.
Last Name :	West
Business Name :	TOP Condominium Association
Address :	8528 Geren Road
City :	Silver Spring
State :	MD
Zip Code :	20901
Email Address :	JPCDC12@AOL.COM

Submission Content/Notes : Top of the Park Condominium Association

Purple Line Task Force

December 30, 2009

Diane Ratcliff

MTA Director of Planning

MTA Office and Planning

6 St. Paul Street, 9th Floor

Baltimore, Maryland 21202

Dear Ms. Ratcliff:

Please accept the attached Testimony on the Development of the Purple Line in the Silver Spring Corridor on behalf of the Top of the Park Condominium Association, Purple Line Task Force. TOP is located about 1.5 miles from the Silver Spring downtown Central Business District. It consists of one hundred sixty six (166) 2 to 3 bedroom units. TOP is eighty five percent owner occupied and fifteen percent rental. The demographics of TOP will find a mixed community both racially and socio-economically.

TOP supports the need for sensible transportation solutions for this rapidly growing region, yet urge balance and careful planning given the potential consequences of a project of this nature. TOP's position on the Purple Line may be summarized in four (4) areas as follows.

- Alternative 8 presents troubling issues for TOP in terms of land impacts, traffic patterns, construction structural considerations and delays, emergency evacuation considerations, property value impacts, environmental impacts and criminal activities.
- TOP strongly supports the position of the Montgomery County Planning Department in finding that the Silver Spring Thayer Design Option station and alignment option is unacceptable and be dropped from further consideration.

- TOP supports the need for additional study on the potential impact of tunneling under Wayne and tunneling to Arliss and Flower.
- TOP supports the recommendation that the State better analyze travel demand and other issues on the east side of the line through East Silver Spring and Takoma-Langley.

Thank you for considering the position of TOP. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

Sincerely,

Joy C. West, Esq.

Chair

Purple Line Task Force

TOP Condominium Association

Purple Line Task Force

Testimony on the Development of the Purple Line in the Silver Spring Corridor

December 30, 2008

TOP of the Park Condominiums

Top of the Park (TOP) Condominiums is located about 1.5 miles from the Silver Spring downtown Central Business District (CBD). It consists of one hundred sixty six (166) 2 to 3 bedroom units, swimming pool, 210 off-street parking spaces and a plethora of mature trees, flowers, plants, varied wildlife and exotic birds. TOP is eighty five percent (85%) owner occupied and fifteen percent (15%) rental. It was built in 1941 during post war construction and converted to condominiums in 1980. The units are townhouse style built of red brick in the colonial revival style. The demographics of TOP will find a mixed community both racially and socio-economically. A large number of the residents are long term homeowners in TOP and many of which are at or approaching the age of retirement.

Several transportation options are currently available at TOP. Four (4) Ride On bus lines serve the Takoma Park and Silver Spring Metro Red Line stations. There is quick and easy access to the Capitol Beltway I-495 with entrances at Colesville Road and University Boulevard. There is also easy access to north/south main streets thru-ways (Piney Branch, Georgia Avenue, 14th and 16th Streets) into the District of Columbia. There is parking for those with cars.

TOP is in walking distance (2 blocks) to small commercial retail outlets at Piney Branch Road and Flower Avenue, a major grocery chain, Giant and Best Way grocery store on Piney Branch between Flower Avenue and Arliss. It is a true community in terms of having the Amom and pop@ styled cleaners, dollar store, shoe store, quick stop stores, restaurants, deli, bakery, gas stations, variety of small businesses and Montgomery County liquor store. Its recreational outlets include the Sligo Creek Parkway trail, Long Branch park and other parks along the Sligo Creek Parkway.

In other words it is true when stated that ATOP is a hidden gem in a rapidly growing Montgomery County@. It=s environment is one of peaceful enjoyment. You can hear the breeze in the motion of wind blown trees. You can enjoy the symphony of nature=s song with the exotic species of migratory birds. You absorb the cadence of the cicada=s mating calls on a hot summer=s night as lightning bugs dart in the late dust of the evening sunset. The sounds of traffic and the growth of bustling city over-development is muffled by the majestic trees that have existed in the TOP for hundreds of years. It is truly an environment where you feel you are far away from the urban sprawl that lies just outside the bounds of the TOP.

Purple Line Alternatives

TOP would be most impacted by proposed Alternative 8 in the Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). Alternative 8 presents troubling issues for TOP in terms of land impacts, traffic patterns, construction structural considerations and delays, emergency evacuation considerations, property value impacts, environmental impacts and criminal activities.

TOP strongly supports the position of the Montgomery County Planning Department in finding that the Silver Spring Thayer Design Option station and alignment option is unacceptable. TOP concurs that the Silver Spring-Thayer design option be dropped from further consideration. Additionally, TOP supports the need for additional study on the potential impact of tunneling under Wayne Avenue and tunneling to Arliss and Flower Avenue. Finally, TOP supports the recommendation that the State better analyze travel demand and other issues on the east side of the line through East Silver Spring and Takoma-Langley.

Construction Impact

TOP is located squarely in the proposed development area. As such TOP residents have a vested interest in whatever alternative is ultimately selected. The construction phase of the project will affect the quiet enjoyment of TOP residents due to noise, vibration, air quality, water quality, traffic pattern alterations and utilities. Our call for continued or more intensive studies in particular areas is generated by the drastic impact resulting from construction delays or mishaps, utility disruptions or changed traffic patterns. TOP is one hundred percent (100%) Pepco reliant meaning in the case of power outages there are no lights, heat, air, hot water, stove, refrigeration, etc. Pepco has often experienced difficulties bringing the area back up when there have been power outages.

Constructing a tunnel as proposed would have significant environmental impacts in the area where TOP is located. Many of the negative impacts of tunneling have been noted in the AA/DEIS and TOP supports the need for continued study of this issue. We request to be specifically included in the study area given our proximity to development area and environmental and infrastructure considerations at TOP.

Traffic Impact

Inasmuch as TOP is located at Piney Branch and Manchester and a few blocks from Wayne and Manchester, residents enjoy the benefit of easy access to major transit routes. Although the Silver Spring-Thayer Alternative 8 may be removed from further consideration, for the record it should be noted that the change in traffic patterns at Piney Branch and Manchester would effectively bar left turns from Manchester to Piney Branch (northbound) and from Piney Branch to Manchester (westward). This type of alteration would impact emergency and evacuation options for TOP residents and others in this area. It is recommended that any alterations in traffic patterns in this area be committed to further study.

Property Value Impacts

The possibility of a major transit center at Arliss and Flower Avenue would completely change the character of this quiet and low crime neighborhood. The AA/DEIS noted that this area is characterized by completely developed established neighborhoods. It is also noted that only thirty four percent (34%) of the population uses public transportation in this area. This is an old established neighborhood. Fortunately, there has been no new construction occurring or over development of high rise commercial and residential structures. The area has not seen a significant population or transit growth over the years. The community has remained relatively stable. One of the benefits of living in TOP is the pace and environmental tranquility. The location of the transit center at Arliss and Flower could make TOP a prime location for increase pedestrian traffic, noise, congestion and crime causing residents to suffer a penalty from the nuisance effects of the project. TOP urges continued study on these impacts to the neighborhood.

TOP is a community of homeowners. The potential impact on property values as a result of any development activity in this area is a constant concern. It is our hope that studies are conducted and made available on the impact that the Purple Line will have on area property values both during and after construction.

Conclusion

TOP supports the need for sensible transportation solutions for this rapidly growing region. As residents we support the efficient movement of people, yet urge balance and careful planning given potential environmental consequences. For TOP residents the possibility of a Purple Line has not evoked a class-warfare discussion pitting poorer communities against wealthier neighborhoods as suggested by the Gazette in its December 10, 2008 editorial, Advance the Purple Line. Rather, we are long term homeowners and would not like for our community to be wracked by construction, heavy equipment, noise, drilling, traffic diversions resulting from a project of this size and proportion. Calling for careful study is a responsible approach. Moreso, in light of a Report from Montgomery County's Office of Legislative Oversight that studied county road projects which found the average project took considerable more time to complete than projected. Project delays could have significant consequences for those residing in the project area and should not be taken lightly.

Thank you for receiving these comments of the TOP Condominium Association, Purple Line Task Force. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

TOP Position.pdf (18 kb)

Attachments :

TOP Condominium Association
Purple Line Task Force
Testimony on the Development of the Purple Line in the Silver Spring Corridor
December 30, 2008

TOP of the Park Condominiums

Top of the Park (TOP) Condominiums is located about 1.5 miles from the Silver Spring downtown Central Business District (CBD). It consists of one hundred sixty six (166) 2 to 3 bedroom units, swimming pool, 210 off-street parking spaces and a plethora of mature trees, flowers, plants, varied wildlife and exotic birds. TOP is eighty five percent (85%) owner occupied and fifteen percent (15%) rental. It was built in 1941 during post war construction and converted to condominiums in 1980. The units are townhouse style built of red brick in the colonial revival style. The demographics of TOP will find a mixed community both racially and socio-economically. A large number of the residents are long term homeowners in TOP and many of which are at or approaching the age of retirement.

Several transportation options are currently available at TOP. Four (4) Ride On bus lines serve the Takoma Park and Silver Spring Metro Red Line stations. There is quick and easy access to the Capitol Beltway I-495 with entrances at Colesville Road and University Boulevard. There is also easy access to north/south main streets thru-ways (Piney Branch, Georgia Avenue, 14th and 16th Streets) into the District of Columbia. There is parking for those with cars.

TOP is in walking distance (2 blocks) to small commercial retail outlets at Piney Branch Road and Flower Avenue, a major grocery chain, Giant and Best Way grocery store on Piney Branch between Flower Avenue and Arliss. It is a true community in terms of having the Amom and pop= styled cleaners, dollar store, shoe store, quick stop stores, restaurants, deli, bakery, gas stations, variety of small businesses and Montgomery County liquor store. Its recreational outlets include the Sligo Creek Parkway trail, Long Branch park and other parks along the Sligo Creek Parkway.

In other words it is true when stated that ATOP is a hidden gem in a rapidly growing Montgomery County= . It=s environment is one of peaceful enjoyment. You can hear the breeze in the motion of wind blown trees. You can enjoy the symphony of nature=s song with the exotic species of migratory birds. You absorb the cadence of the cicada=s mating calls on a hot summer=s night as lightning bugs dart in the late dust of the evening sunset. The sounds of traffic and the growth of bustling city over-development is muffled by the majestic trees that have existed in the TOP for hundreds of years. It is truly an environment where you feel you are far away from the urban sprawl that lies just outside the bounds of the TOP.

Purple Line Alternatives

TOP would be most impacted by proposed Alternative 8 in the Purple Line Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS). Alternative 8 presents troubling issues for TOP in terms of land impacts, traffic patterns, construction structural considerations and delays,

emergency evacuation considerations, property value impacts, environmental impacts and criminal activities.

TOP strongly supports the position of the Montgomery County Planning Department in finding that the Silver Spring Thayer Design Option station and alignment option is unacceptable. TOP concurs that the Silver Spring-Thayer design option be dropped from further consideration. Additionally, TOP supports the need for additional study on the potential impact of tunneling under Wayne Avenue and tunneling to Arliss and Flower Avenue. Finally, TOP supports the recommendation that the State better analyze travel demand and other issues on the east side of the line through East Silver Spring and Takoma-Langley.

Construction Impact

TOP is located squarely in the proposed development area. As such TOP residents have a vested interest in whatever alternative is ultimately selected. The construction phase of the project will affect the quiet enjoyment of TOP residents due to noise, vibration, air quality, water quality, traffic pattern alterations and utilities. Our call for continued or more intensive studies in particular areas is generated by the drastic impact resulting from construction delays or mishaps, utility disruptions or changed traffic patterns. TOP is one hundred percent (100%) Pepco reliant meaning in the case of power outages there are no lights, heat, air, hot water, stove, refrigeration, etc. Pepco has often experienced difficulties bringing the area back up when there have been power outages.

Constructing a tunnel as proposed would have significant environmental impacts in the area where TOP is located. Many of the negative impacts of tunneling have been noted in the AA/DEIS and TOP supports the need for continued study of this issue. We request to be specifically included in the study area given our proximity to development area and environmental and infrastructure considerations at TOP.

Traffic Impact

Inasmuch as TOP is located at Piney Branch and Manchester and a few blocks from Wayne and Manchester, residents enjoy the benefit of easy access to major transit routes. Although the Silver Spring-Thayer Alternative 8 may be removed from further consideration, for the record it should be noted that the change in traffic patterns at Piney Branch and Manchester would effectively bar left turns from Manchester to Piney Branch (northbound) and from Piney Branch to Manchester (westward). This type of alteration would impact emergency and evacuation options for TOP residents and others in this area. It is recommended that any alterations in traffic patterns in this area be committed to further study.

Property Value Impacts

The possibility of a major transit center at Arliss and Flower Avenue would completely change the character of this quiet and low crime neighborhood. The AA/DEIS noted that this area is characterized by completely developed established neighborhoods. It is also noted that only thirty four percent (34%) of the population uses public transportation in this area. This is an old established neighborhood. Fortunately, there has been no new construction occurring or over development of high rise commercial and residential structures. The area has not seen a significant

population or transit growth over the years. The community has remained relatively stable. One of the benefits of living in TOP is the pace and environmental tranquility. The location of the transit center at Arliss and Flower could make TOP a prime location for increase pedestrian traffic, noise, congestion and crime causing residents to suffer a penalty from the nuisance effects of the project. TOP urges continued study on these impacts to the neighborhood.

TOP is a community of homeowners. The potential impact on property values as a result of any development activity in this area is a constant concern. It is our hope that studies are conducted and made available on the impact that the Purple Line will have on area property values both during and after construction.

Conclusion

TOP supports the need for sensible transportation solutions for this rapidly growing region. As residents we support the efficient movement of people, yet urge balance and careful planning given potential environmental consequences. For TOP residents the possibility of a Purple Line has not evoked a class-warfare discussion pitting poorer communities against wealthier neighborhoods as suggested by the Gazette in its December 10, 2008 editorial, Advance the Purple Line. Rather, we are long term homeowners and would not like for our community to be wracked by construction, heavy equipment, noise, drilling, traffic diversions resulting from a project of this size and proportion. Calling for careful study is a responsible approach. Moreso, in light of a Report from Montgomery County's Office of Legislative Oversight that studied county road projects which found the average project took considerable more time to complete than projected. Project delays could have significant consequences for those residing in the project area and should not be taken lightly.

Thank you for receiving these comments of the TOP Condominium Association, Purple Line Task Force. It is our hope to continue to work with transit and County officials as the Purple Line project forges ahead.

Joy C. West, Esq.
Chair
Purple Line Task Force
TOP Condominium Association
8528 Geren Road
Silver Spring, Maryland 20901
301-587-1999

- RECORD #21 DETAIL

First Name : Andrew
Last Name : Friedson
Business Name : UMCP Student Government Association
Address : 168 Stamp Student Union
City : College Park
State : MD
Zip Code : 20742
Email Address : afriedso@umd.edu
Submission Content/Notes : I am the Student Body President at University of Maryland, College Park. I would like to request membership from the Student Government Association on the Purple Line Community Focus Group in College Park/Riverdale. Students represent half of the City's population, yet we have no representation on the council. Please let me know how I can make sure that this occurs. Thank you!

- RECORD #1163 DETAIL

First Name :	Jonathan
Last Name :	Sachs
Business Name :	President, SGA
Address :	4230 Knox Road
City :	College Park
State :	MD
Zip Code :	20740
Email Address :	

Submission Content/Notes : Jonathan Sacks, J-O-N-A-T-H-A-N, last name S-A-C-H-S. I live at 4230 Knox Road in College Park, 10 20740. This year I am serving as the President of the student body at the University of Maryland.

I believe that the purple line gives us a choice between more of the same unsustainable, unreasonable and inconvenient ways to get around or changing the way we view getting around our region and providing fair opportunities for safe and sustainable transportation.

As a student, I understand that this project will be coming right through our campus, but I'm in favor of bringing it into our community.

In fact, support for the purple line on our campus boasts the largest and most diverse student coalition of support for any external issue.

Organizations who have signed on to support the project include all the governance bodies on campus, many of the campus cultural groups including the Black Student Union and Latino Student Union, as well as political and community organizing groups such as Maryperg, Community Roots and the College Democrats.

Students also believe that the purple line should be light rail and built in the correct location on our campus.

The purple line should go on the Campus Drive alignment for several reasons. Campus Drive is the most viable alignment for the growth of our university, and in the university master plan, several of the parking lots close to the middle of campus will be converted into new academic buildings.

As parking spaces are eliminated, commuter students, administrators and faculty will be searching for alternatives to driving to campus.

Transit into the middle of campus is an attractive way to encourage use and get individuals to use convenient and sustainable transportation.

Additionally, the Campus Drive alignment gives the most amount of students on campus the easiest access to light rail transit.

Furthermore, putting the purple line on Campus Drive would not involve building a new road or cutting through any green space. In fact, the layout of the campus will hardly change, and this alignment will preserve the beauty of our campus.

On the question of vibration and electromagnetic interference, EMI, of course it's unfair to ask the science departments to relocate their experiments. However, from what I have seen, there has been no conclusive evidence to show that the impacts of light rail vehicles could not be mitigated by the professors conducting the experiments.

The Prinkert to Chapel Drive alignment on the other end will place light rail in a very dense pedestrian area where there is currently no transit infrastructure.

Building light rail in that location would involve paving a road through one of the oldest parts of campus and introducing transit to a completely pedestrian area.

If the purple line runs in the narrow corridor between the south campus dining hall and the Frac Hall, especially with the eventual renovation of the south campus dining hall to include a gymnasium and a new dining

hall, it would truly ruin the pedestrian friendly area of south campus.

Aesthetically having the purple line run by the memorial chapel will also hurt some of the beauty of our campus, not to mention expose labs on that part of campus to brand new vibration and EMI factors never having any road or any transit infrastructure there in the past.

Finally, ridership numbers are lower on the Prinkert Drive alignment. It costs millions more than Campus Drive and gives fewer students incentive for convenient access to light rail.

In conclusion, I believe that the student body has come together to support this extremely important effort and also supports building light rail on Campus Drive.

For students, the purple line is not just a here and now issue. Students plan to come back to campus on the purple line and enjoy a vibrant and modern campus. There is longevity in support for this project from current students like myself who will be advocating for this project and hopefully using it long after we graduate. Thank you.

- RECORD #2242 DETAIL

First Name : Laura
Last Name : Pinto
Business Name : University Landing Tenant' Association
Address : 1028 University Blvd., Apt #932
City : Silver Spring
State : MD
Zip Code : 20903
Email Address :
Submission Content/Notes :
Attachments : Pinto_Laura.pdf (831 kb)



Purple Line AA/DEIS Comment Form

Only comments received by January 14, 2009 will be included in the Public Hearing Record for the Purple Line Transit Study.

PLEASE PRINT

Name: Laura Pinto Organization: University Landing Tenants Assoc.
Address: 1028 University Blvd. Apt #932
City: Silver Spring State: MD Zip Code: 20903

I/We wish to submit the following comments on this project: I am in agreement
that this area where I live needs better access to
public transit. I also agree that it would be better to
have a train Purple Line than a bus Purple Line. Before
construction begins, however, we need to have a good
understanding of the impact this development is going to have
with regards to possible rent increases for small business
owners and people who live in apartments. What guarantee
do people like me have that we will not be displaced
as a result of Purple Line development? We support
the project, but we need protections.

- RECORD #3270 DETAIL

First Name :	Vance
Last Name :	Ayers
Business Name :	Washington DC Building and Construction Trades Council
Address :	5829 Allentown Road
City :	Camp Springs
State :	MD
Zip Code :	20746
Email Address :	vayres@dcbuildingtrades.com

Submission Content/Notes : We at the Washington DC Building Trades Council would like to thank you for your support for the Purple Line. As you know, this environmentally-friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of the Washington DC Building Trades Council are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

As you know, the Washington DC Building Trades Council represents 30,000 construction workers in Maryland, DC and Virginia. The State of Maryland and its localities along with our members would directly benefit from the Purple Line if you build it with the union building trades and our signatory contractors. We are the best at what we do in the world and everyone that this affects deserves the safest and most well built light rail system they can have. This system will benefit all by shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

We represent working people, and like the rest of the labor movement, we know that the Purple Line will be a great asset for our members, other working families, and all communities. For too long the working class citizens of Montgomery and Prince George's County have taken multiple buses to access the job centers in College Park, Silver Spring, Rockville, and Bethesda.

A light rail Purple Line will not only encourage economic growth by linking the regions major job centers, but will greatly reduce travel times and provide transportation equity by offering working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge that you support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into

this
critical phase, please do everything in your power to ensure that the
project
wins federal funding and is built by union members without delay.

Attachments :

Ayres 34922.pdf (115 kb)

**Office of THE GOVERNOR'S OFFICE
MAIL FORM**

INSTRUCTIONS: Please investigate the attached and take whatever action is necessary to respond to our constituent's concerns. When completed, please forward the response, the original letter and back-up to the unit indicated below. Also, if there are any questions as to how to respond, please call the unit listed below.

Letter ID: 487255
Receive Date:
Letter Date: 12/17/2008
Deadline Date: 1/19/2009

From:
Vance Ayres
5829 Allentown Road
Camp Springs ,MD 20746

Subject: MDOT - Purple Line Supports purple line.

History Log:

Date Completed	Action Taken	Completed By	Assigned By
12/18/2008 09:17:12 AM	Correspondence Entry	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith
12/18/2008 09:21:29 AM	Subject Entry	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith
12/18/2008 09:21:35 AM	Delegated	Executive Services: Ja'Nai Keith	Executive Services: Ja'Nai Keith

RE-DIRECT INFORMATION

If the response to this correspondence should be handled by another agency, please complete the following information and forward the completed form and the correspondence to the proper agency. Also, copy the completed form and send the copy to the unit indicated above.

Re-directed to: _____

Date: _____



ypFrom: Vance [vayres@dcbuildingtrades.com]
Sent: Wednesday, December 17, 2008 9:15 AM
To: Governor
Subject: concerned citizens- purple line

Dear Governor O'Malley,

We at the Washington DC Building Trades Council would like to thank you for your support for the Purple Line. As you know, this environmentally-friendly mass transit project has broad support from both Prince George's and Montgomery County's workforce and is critical to our future quality of life. The members of the Washington DC Building Trades Council are writing to request that you continue doing everything in your power to get a light rail Purple Line funded and built without delay.

Now that the U.S. Department of Transportation has reviewed Maryland's application for federal funds and the Maryland Transit Administration is conducting public hearings on the draft environmental impact statement, it is critical that your support for a light rail Purple Line be part of the State's record.

As you know, the Washington DC Building Trades Council represents 30,000 construction workers in Maryland, DC and Virginia. The State of Maryland and it's localities along with our members would directly benefit from the Purple Line if you build it with the union building trades and our signatory contractors. We are the best at what we do in the world and everyone that this affects deserves the safest and most well built light rail system they can have. This system will benefit all by shorter commutes and the creation of new jobs and economic development along the proposed route. Transportation experts estimate that 35,000 new jobs are created for every \$1 billion invested in transit.

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A light rail Purple Line will not only encourage economic growth by linking the regions major job centers, but will greatly reduce travel times and provide transportation equity by offering working-class and service workers the same type of transit options long available to many areas of Prince George's and Montgomery County.

Again, we strongly urge that you support a light rail Purple Line to improve the lives of our members today and into the future. As the project moves into this critical phase, please do everything in your power to ensure that the project wins federal funding and is built by union members without delay.

Sincerely,

Vance T. Ayres, Executive Secretary Treasurer
Washington, DC Building and Construction Trades Council
5829 Allentown Road
Camp Springs, MD 20746

T 301 899-8134

F 301 899-8187

C 240 533-7625



- RECORD #1135 DETAIL

First Name : Suchitra
Last Name : Balacaudran
Business Name : West College Park Citizens Association
Address : 9320 St. Andres
City : College Park
State : MD
Zip Code : 20740
Email Address :

Submission Content/Notes : Hi, I'm. I'm the President of the West College Park Citizens S-U-C-H-I-T-R-A is the first name. Last name is B-A-L-A-C-H-A-N-D-R-A-N.

The West College Park Citizens Association is a strong supporter of the purple line. We have passed the purple line resolution and I'm here to state unequivocally that we would really like to see the purple line up and running through the center of campus as I'm now glad the alignment is now going to be with the stop on East Campus.

But I'm really here to say more than the fact that we should support the purple line. I'm here to point out the stark reality on the ground.

In September, the Consolidated Transportation Plan which is a budget that the state has from 2009 to 2014 was \$10.5 billion until the state announced a \$1.1 billion cut in the budget and brought it down to \$9.4 billion because we don't have the money.

Just yesterday the Chief Policy Analyst of the Maryland Legislative Services pointed out that our revenue forecasts are below what we expect and that the consolidated transportation plan will now be somewhere around \$6.9 billion for the next six years.

So this is the stark reality of the ground and the question I would like to ask is not whether or not the purple line is going to come but to show us how we are going to get from where we are to where we need to be and to fund the purple line.

This is a question not just for you but for everybody in the audience to pay attention to. We have in the Consolidated Transportation Plan a big white elephant that is known as the intercounty connector which is eating up a lot of our funds and this is the expense of transit.

So I'm here as a strong transit advocate to point out that if we do not look at the budget and if we do not look at the projects we need to cut, we're never going to get to where we want to get to.

Maryland has the third largest coastline in the United States. Climate change faces us and we've had a climate commission appointed by the governor to look into what we need to do to reduce our carbon dioxide emissions.

Forty percent of the carbon dioxide that we have comes from transportation and the only way we can reduce that is to have people get out of their cars and into transit. This is the absolute wrong time to build a highway. This is the right time to build transit. So I'll end my statement there. Thank you.

- RECORD #1128 DETAIL

First Name : Lee
Last Name : Rowe
Business Name : West Lanham Hills Citizens Association
Address : 7744 Decatur Road
City : Hyattsville
State : MD
Zip Code : 20784
Email Address :

Submission Content/Notes : Good afternoon. My name is Lee Rowe, L-E-E R-O-W-E. I'm the President of the West Lanham Hills Citizens Association, in which West Lanham Hills directly abuts Ellin Road and is right across from the New Carrollton Metro. So the Purple Line would have a direct effect on our community. In fact, my house is facing Ellin Road which is one of the roads that might be taken for the Purple Line.

Needless to say, that we prefer the Harkin Road Route. It's a little bit farther away from our community. But the main concern is the impact, not only a final result of a Purple Line but also the construction of the Purple Line would have on our community.

My chief fear is sort of the languishing of the construction process in which we would see orange cones or barrels there month after month after month, which would directly impact the people in our neighborhood. So we're hoping that, and we are appreciative of the fact that you have taken our concerns in to account in your studies and your reports.

We hope that you'll continue to do that and that the final result when it is eventually finished, of course, will be more pedestrian traffic and other traffic and we are hoping that the State and the County, and we've been working with the County on the Transit Development Overlay Zone which also will effect us, to make sure that safety and security measures are taken proactively rather than after the fact.

So again our main concern in West Lanham Hills is just the impact it would have on our community. Not only in the construction phase but in the final phase and that we're hoping that officials, elected and otherwise, will take proactive measures so that any impacts will be mitigated, minimized, and that we can continue on.

We have no particular position on whether we support or oppose the Purple Line. But we are, again, concerned about its effect on our community and certainly those properties that are next to the proposed routes, whether they be Ellin Road or on 450 or Harkin Road as well.

But I do want to thank you again for taking our concerns in to consideration at the past hearings and for this hearing as well. I also want to thank you for publicizing the hearings and making sure that you do get our input. Thank you.

- RECORD #1134 DETAIL

First Name :	Casey
Last Name :	Anderson
Business Name :	Woodside Civic Association
Address :	8730 1st Avenue
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	240.472.0311

Submission Content/Notes : I'm Casey Anderson. My first name is spelled C-A-S-E-Y, like Casey at Bat. My last name is Anderson, A-N-D-E-R- S-O-N. I live in Silver Spring.

I want to say first thank you to Mike Madden. I don't know the rest of these panelists, but you are a true professional. I really admire your grace under pressure in this whole process.

I know it hasn't been easy walking into places like Bethesda and Chevy Chase during this process and you have done a great job. It has been noticed.

I know Moe Eudahl once said that everything that can be said has already been said, but not everybody has had a chance to say it. I'm going to try to at least package these arguments and put them together in a way that you haven't heard before.

I know that at the hearing last night at 4H, you heard probably that WABA, the bicyclist association, Montgomery Bicycle Advocates and Coalition for the Capital Crescent Trail have all recently issued statements in which they flatly reject the arguments that have been advanced by opponents of the purple line suggesting that the purple line and one or more of its configurations would be damaging to the trail.

There is not a single organization that was not expressly organized for the purpose of opposing the purple line that has embraced the argument that the purple line would hurt the trail.

In fact, the WABA statement as well as the Montgomery Bicycle Advocates statements are very interesting because they point out the ways in which the purple line particularly in the medium and heavy rail investment configurations would actually improve the trail by separating it from at-grade crossings at places like Connecticut Avenue at 16th Street, at Jones Bridge Road, places which right now are too dangerous to allow your children to use the trail right now.

So the first point is the Woodside Civic Association which I represent believes that the purple line, particularly the light rail higher investment options would be a vast improvement to the trail. Not only for using the trail into Bethesda and ultimately south into the District of Columbia, but also across 16th Street, for example, and allow children to be able to have safer access to local destinations which are adjacent to the trail like Woodland Elementary School where my 8- year-old attends.

The second reason that the Woodside Civic Association supports the light rail option in particular is because it provides safe and efficient access not only to Bethesda, to the restaurant district, to entertainment and recreation options along the trail and in the Bethesda Central Business District, but also because it allows us to get to events in College Park here at the University of Maryland in a way that's convenient and doesn't require access to an automobile where you'll be stuck in traffic endlessly and have to find a parking space.

We particularly endorse everything that Harry Sanders just told you about travel times. Remember, time actually is money and while you haven't quantified it in the EIS, you could impute the prevailing wage rate in this area to calculate the lost dollars that are caused by people being delayed on a slower, lower investment bus routing or even lower investment rail option.

We think that militates strongly in favor of a heavier investment in rail. Thanks very much for your attention.

- RECORD #1685 DETAIL

First Name :	Casey
Last Name :	Anderson
Business Name :	Woodside Civic Association
Address :	
City :	
State :	MD
Zip Code :	
Email Address :	caseybanderson@aol.com

Submission Content/Notes : Comments of Woodside Civic Association in Support of Light Rail Purple Line

The Woodside Civic Association strongly supports the light rail alternatives described in the Purple Line Draft Environmental Impact Statement (DEIS), particularly the “medium” and “heavy” investment options. WCA members have twice voted unanimously (in 2003 and 2008) to support joint use of the Georgetown Branch right-of-way for a light rail line and trail. WCA believes that completion of the Purple Line and Capital Crescent Trail (CCT) should be the number one transit priority for the state.

WCA represents homeowners and tenants living along the CSX right of way and between Spring Street, 16th Street and Georgia Avenue, an area immediately abutting the proposed Purple Line route and the CCT. As representatives of residents whose neighborhood will be directly affected by the Purple Line and CCT, we see this project as offering enormous benefits, including:

Faster and easier access to destinations along the Purple Line route. The Purple Line will provide quick and convenient transit connections to events at the University of Maryland in College Park, to restaurants in Bethesda, and to other destinations along the proposed route. Woodside residents look forward to being able to take advantage of these amenities without the expense and difficulty of driving and parking. By connecting the two ends of Metro’s Red Line, the Purple Line also will cut travel times from Woodside to Rockville, Friendship Heights and many other destinations.

Reduced traffic congestion in Silver Spring. The Purple Line will help to mitigate the amount of automobile traffic generated by the revitalization of downtown Silver Spring, protecting the quality of life in Woodside and other nearby neighborhoods.

Completion and improvement of the Capital Crescent Trail. Construction of the medium or heavy investment light rail options will make the CCT safer and more accessible by creating grade-separated crossings of several busy intersections, including Connecticut Avenue, Jones Bridge Road, 16th Street, and Colesville Road. The intersection at 16th Street is especially important to Woodside as the Purple Line will allow for safe crossings by children walking or riding their bicycles to Woodlin Elementary School.

The Purple Line also will allow for completion of the long-delayed permanent section of the CCT from Stewart Avenue to the new Silver Spring Transit Center. This segment will give walkers and bicyclists an off-street path from Bethesda to downtown Silver Spring and ultimately to the terminus of the Metropolitan Branch Trail near Union Station in the District of Columbia.

For all of these reasons, WCA submits that the Purple Line will improve

the quality of life in our neighborhood and in the other communities along its route. We urge the state and county to move forward quickly to complete this vital project.

- RECORD #1238 DETAIL

First Name :	Barbara
Last Name :	Ditzler
Business Name :	President, Woodside Park Civic Assoc
Address :	1225 Moyes Drive
City :	Silver Spring
State :	MD
Zip Code :	20910
Email Address :	

Submission Content/Notes : Barbara, B-A-R-B-A-R-A, Ditzler, D-I-T-Z-L-E-R. I live in Silver Spring and I am President of the Woodside Park Civic Association. Woodside Park is a community of 650 homes that adjoins downtown Silver Spring immediately to the north.

Our civic association met in May to learn details about the purple line. The overwhelming consensus at that meeting was in favor of a light rail option with a route directly linked to downtown Bethesda.

So why are we in favor of the light rail purple line? It means relying less on a car as it offers the opportunity to ride to Bethesda in nine minutes, to College Park campus in 25 minutes.

This holds great appeal to us for our jobs, for our doctor's appointments, for our classes, lectures, concerns, libraries, sports, restaurants and entertainment.

We can hop on the purple line, go to New Carrollton in 50 minutes, thereby connecting to the Amtrak. Another great resource.

By connecting the Metro stops in the east/west route, the destination opportunities are abounding.

The purple line will enable an extended bicycle path to be built, replacing the current patchwork trail with so much street use. The families will be able to bike safely for leisure enjoyment and commuters will appreciate a healthy way and safe way to bike to work.

I look forward to weekend rides during the week when I need to go to my league meetings, I'll be able to hop on for the ride. I'll be able to begin in Silver Spring, I'll be able to continue on to many communities along the trails that entail minimal street crossing, less traffic, a safer route.

By boarding a light rail train, we can ride into the future. We will have more environmentally friendly methods of transportation.

Using rail permits clean electricity to fuel the system and the tracks laid on that permeable surface for better water conservancy.

Taking many cars off the road with this alternative transportation is an efficient and clean method and it makes my neighborhood and other neighborhoods more livable. We are taking the cars off the road.

Our son lives in San Francisco. He has light rail running directly in front of his house. Not only does it make it a desirable place for him, it makes an ideal place for others like parents visiting obviously.

It is a very positive place, having the rails running directly in front of his house.

This summer we visited Sagreb, Croatia. There we saw a very large and busy light rail system. We saw pre-World War II rail cars that operated alongside the sleek, quiet, modern ones.

Pedestrians and rail mixed freely on the streets with cars. They could blend together in an efficient, pedestrian-friendly system. This is what Silver Spring can be for the light rail system.

The purple light rail system is a green ticket and I will happily hop aboard.

- RECORD #2866 DETAIL

First Name : Greg
Last Name : Fuhs
Business Name : World Resources Institute
Address : 10 G Street, NE Suite 800
City : Washington
State : DC
Zip Code : 20002
Email Address : GFUHS@WRI.ORG
Submission Content/Notes : Dear MTA Purple Line Team,

On behalf of the World Resources Institute, please accept our submission of the attached comments on the Purple Line AA/DEIS. Thank you for the opportunity to provide feedback, and please don't hesitate to contact me if you have any questions.

Attachments : World Resources Institute.pdf (246 kb)

Public Comments on the Purple Line AA/DEIS

Submission by World Resources Institute, 10 G Street NE, Washington DC 20002

Key Findings and Recommendations

Findings:

- 1) WRI's sensitivity analysis of estimated costs and ridership for the various Purple Line options finds that Medium Investment Bus Rapid Transit (BRT) is the most cost-effective and lowest-risk build alternative.
- 2) WRI's assessment of carbon dioxide (CO₂) emissions projections confirms that Medium and High Investment BRT are the only alternatives likely to reduce CO₂ emissions from the No Build scenario.
- 3) Despite its public popularity, WRI concludes that the Light Rail Transit (LRT) option is less robust, as our analysis shows that it will increase CO₂ emissions and very likely overrun current cost projections.

Recommendations:

- 1) WRI supports a transit investment in the proposed east-west corridor, and argues that the No Build and Transportation System Management alternatives are inadequate to address the congestion problem at hand.
- 2) WRI recommends the Medium Investment BRT option based on our findings on cost-effectiveness and CO₂ emissions benefits.
- 3) WRI believes that the inputs used to forecast greenhouse gas emissions by the AA/DEIS need to be improved before a final decision is made. (For example, we recommend revisiting the choice of emissions factors, type of fleet, and occupancy).



Introduction

About WRI

WRI is a nonpartisan environmental think tank based in Washington DC. Our staff of 160 works on a broad array of environment and sustainable development issues worldwide, providing peer-reviewed research and analysis and working with a wide range of partners to find practical solutions to some of our world's most pressing problems.

WRI has a goal to promote socially, financially, and environmentally sustainable transportation solutions based on well-informed and participative decision-making processes. With this in mind, we believe that a comprehensive impact assessment of proposed transport projects is critical to the decision-making process.

The World Resources Institute (WRI) appreciates the opportunity to comment on the Purple Line Alternatives Analysis / Draft Environmental Impact Statement (AA/DEIS). We commend MTA for striving to undertake such an assessment through the AA/DEIS, and for working to ensure an extensive and open public participation process. Our experience indicates that incorporating public input into decision making will likely lead to better outcomes for the project under consideration.

We are submitting these comments on the AA/DEIS for two primary reasons. First, as a local organization with many staff living near the proposed route, we have a direct stake in seeing the best possible alternative selected. Second, we have significant experience analyzing and implementing sustainable transit solutions around the world, and wish to bring our expertise to bear on this important local issue. While we have not joined any particular group or coalition either supporting or opposing the Purple Line project, we have consulted with a diverse group of stakeholders to gather information and insights on the project, and we have assessed key elements of the AA/DEIS with a commitment to objectivity and analytical rigor. In accordance with WRI policy, this document has been peer-reviewed prior to submission.

We have elected to focus on the following areas where we believe we can add the most value:

- 1) A general review of the merits of building robust, sustainable mass transit alternatives.
- 2) A sensitivity analysis of cost and ridership projections in the AA/DEIS.
- 3) An evaluation of the AA/DEIS's emissions projections for carbon dioxide, the primary greenhouse gas.

We expect that other stakeholders will comment on additional important concerns about the proposed system, such as whether to tunnel under downtown Silver Spring and Wayne Avenue or how best to preserve the Capital Crescent Trail. While we defer to these local communities on the best way to resolve these concerns, based on our discussions with stakeholders it appears that these issues have not yet been fully addressed. Thus we encourage MTA to continue working with the affected communities—even after selection of the locally preferred alternative—to find satisfactory solutions.

Our Region's Sustainable Transportation Imperative

The Purple Line initiative offers the Washington DC Metropolitan Area the opportunity to take a national lead in providing 21st century solutions to the decades-old problems of traffic congestion and associated pollution. At a time when clean energy and fuels are a major and growing policy concern, both nationally and at the state level, we have an opportunity to improve outdated transport infrastructure, provide better transit options for the traveling public, and reduce our region's impact on global warming.

Major capital projects implemented in the near-term will shape the long-term future of transport in the region. WRI urges regional planners and other decision makers to consider current needs and concerns in the context of tomorrow's transportation challenges, especially regarding traffic congestion, fuel costs, and climate change.

Cities across the United States face similar challenges in updating transportation infrastructure, and those that develop cost-effective transport systems with an ability to accommodate present as well as future needs are the most likely to achieve long-term success. Mass transit systems and transit-oriented development are essential strategies for fostering such outcomes.

Challenges and Trends

WRI wishes to emphasize the implications of the long-term regional transportation outlook on the Purple Line decision-making process. Decision makers must recognize these challenges and acknowledge related trends that will impact the region's future transportation needs, such as:

- increasing traffic congestion with a growing regional population;
- crowding on Metro and bus lines throughout the DC area; and
- volatile fuel prices due to projected scarcity, growing demand, and anticipated greenhouse gas regulations.

According to projections from the Metropolitan Washington Council of Governments, congestion and crowding in 2030 could be pervasive. Vehicle miles traveled (VMT) is expected to grow more than twice as fast as highway and road capacity, from 109 million miles in 2000 to 150 million miles in 2030. Capital Beltway traffic is projected to be at a continual "stop and go" pace by 2030, largely due to heavy westbound and suburb-to-suburb travel. Existing transit options will be strained to the limits, with heavy peak-hour crowding across the Metro system.¹

It is also important to plan for the prospects of rising fossil fuel costs and increasingly stringent greenhouse gas (GHG) regulations. Increasing gas prices and a need to shift to low-carbon transport options are often discounted or ignored in transportation planning. Yet these factors significantly influence future transportation needs and must be factored into near-term planning.

¹ See Metropolitan Washington Council of Governments. 2006. "What if the Washington Region Grew Differently?" Results to date of the Transportation Planning Board's Regional Mobility and Accessibility Study: <http://www.mwcog.org/uploads/committee-documents/vVpdWlk20060118160021.pdf>

In light of such trends, the costs and benefits of MTA's various build alternatives need to be carefully weighed against the costs of a business-as-usual (i.e., No Build) approach to transportation.

The Transportation System Management (TSM) option does have some appealing attributes relative to No Build and is a low-cost alternative. On its own, however, TSM is a wholly inadequate solution for addressing long-term transportation needs in the east-west corridor. While it might provide some short-term benefits, these would be quickly overwhelmed by expected growth, and within a few years the region would likely be back to where it started: contemplating various BRT and LRT alternatives, only at potentially higher costs and in a more politically challenging environment.

Key Questions for Transport Planners

WRI urges decision makers to consider the outcomes of further postponement of a robust Purple Line. Concerns to consider include:

- Is current congestion and crowding at a point where a transit line is already overdue?
- Are marginal transportation fixes appropriate for addressing future population growth?
- Will traditional road building have fewer impacts on neighborhoods than mass transit?
- What transit alternatives will be available in the future if the Purple Line is delayed?

Other cities have taken a synergistic approach by complementing public transportation systems with policy instruments, aware that mass transit ridership can dramatically increase when targeted incentives are in place (see examples from Oregon in Appendix A). Market mechanisms such as congestion road pricing and dynamic parking pricing, alongside policy tools such as vehicle use restrictions and road space reallocation, have proven effective as Transportation Demand Management (TDM) strategies elsewhere.

WRI encourages decision makers to consider the positive cumulative benefits that a robust Purple Line would offer. Among other things, a well-designed system would shift more drivers to public transportation, reduce traffic congestion, and cut back on roadway maintenance costs. A Purple Line will not solve all of our regional traffic problems, nor is it intended to do so. However, as one small but important step in the right direction, this transit project and others like it can—if done right—add up to create a brighter transportation future for our region.

WRI Sensitivity Analysis of Cost and Ridership Projections in the Purple Line AA/DEIS

Summary

Estimated costs and ridership are key elements that define the differences between Purple Line alternatives, and their relative benefits and drawbacks. Understanding these variables should therefore be a crucial part of the decision-making process.

WRI examined the sensitivity of the cost and ridership projections provided by the AA/DEIS, using a Monte Carlo Simulation to model outputs under wide but probable variations for both of these critical projections.² Two scenarios were modeled: one in which the forecasts in the AA/DEIS were treated as accurate, and one in which the forecasts were treated as optimistic. Our analysis found that:

- The most robust alternative in terms of cost-effectiveness is Medium Investment BRT.
- There is very high risk that the High Investment BRT and all of the LRT alternatives will not meet the cost and demand projections in the AA/DEIS.

WRI strongly recommends that decision makers consider this information when selecting the locally preferred alternative for the Purple Line.

Background

The summary of Key Evaluation Measures in the AA/DEIS presents point (single-value) forecasts of costs, demand, and user benefits (among other measures), based on standard professional practices. Unfortunately, standard professional practices do not account for the uncertainty associated with predicting costs and ridership.

There is enough evidence in the existing literature to indicate that cost and ridership forecasts are often optimistic at the planning stages. For example, B. Flyvbjerg et al. consolidated data for 44 urban rail projects, and found that average cost overrun was 45 percent and actual ridership was on average 51 percent lower than forecast.³ The cases analyzed by Flyvbjerg et al. include the Washington Metro (which had a cost overrun of 85 percent) and the Baltimore Metro (which had a construction cost overrun of 60 percent and an actual ridership of 40 percent of the figure forecast in the opening year). Transit projects entail the double risk of higher costs and lower demand than expected, and it is better to incorporate such risks in the decision making process than to ignore them.

² Monte Carlo Simulation is a probabilistic technique commonly used in financial analysis to model project outcomes to complex combinations of projects inputs. The Monte Carlo Simulation randomly and repeatedly generates values for uncertain variables. The results are analyzed to decide which variables are most likely to occur. It derives its name from Monte Carlo, the Monaco city near the South of France, which is known for its casinos. <http://www.yourdictionary.com/monte-carlo-simulation>

³ Flyvbjerg B., Bruzelius N. and W. Rothengatter. "Megaprojects and Risk: An Anatomy of Ambition." Cambridge University Press, UK, 2003.

Methodology

We used a method commonly employed in financial analysis to deal with uncertain futures and complex processes called Monte Carlo Simulation.⁴ By using this process we sought to identify alternatives that are “robust” rather than “optimal” in that they fare well under a wide range of values of key variables, rather than performing best when a single future has been forecast.⁵ We concentrated our analysis on three variables: cost, demand, and cost-effectiveness.⁶ Results were compared based on cost per hour of user benefit, per guidance from the Federal Transit Administration (FTA). We conducted the Monte Carlo Simulation analysis for two scenarios:

- 1) The cost and ridership levels are represented by a probability distribution with the mean being the forecast values in the AA/DEIS.
- 2) The cost and ridership levels are represented by a probability distribution with the mean corrected for optimism.

We used these two scenarios because there is a need to incorporate uncertainty in the analysis, since we are dealing with future events that are uncertain by nature. Scenario 1 assumes the forecasts in the AA/DEIS are relatively accurate, while Scenario 2 assumes they are optimistic—consistent with the evidence of frequent optimism in planning for infrastructure projects as noted by Flyvbjerg et al. Assumptions for this analysis are presented in Appendix B.

Results

The Monte Carlo Simulation simulation allows us to get direct probabilities for the variables of cost, ridership, and cost-effectiveness. Not surprisingly, the costs are always greater for the more sophisticated alternative. For example, Medium Investment LRT is greater than Medium Investment BRT, which in turn is greater than TSM. In addition, the demand is always greater for MI BRT than TSM, and 90 percent of the time greater for MI LRT than MI BRT. However, MI LRT is less cost-effective than MI BRT 88.5 percent of the time.

As Table 1 below indicates, the difference in average costs between alternatives is large (607 percent between MI BRT and TSM, and 110 percent between MI BRT and MI LRT). The difference in demand is large between MI BRT and TSM (206 percent), but is small between MI BRT and MI LRT (15 percent).⁷ The difference in the FTA cost-effectiveness metric (cost per hour of user benefit) between MI BRT and MI LRT is moderate (52 percent).

⁴ See footnote 2 for a definition of Monte Carlo Simulation.

⁵ M. Wachs, *Linking Forecasts to Action: Roles, Uses & Misuses of Forecasts in Transportation, Land Use, and Environmental Decision Making*, Lake Arrowhead – UCLA, October 19-21, 2008.

⁶ Cost-effectiveness is a metric that synthesizes the lifecycle costs (capital and operations) and the transport benefits of the project (total travel time reductions per user, multiplied by the number of users).

⁷ The table shows results for Scenario 1 only, as the results for Scenario 2 were very similar in this case.

Table 1. Simulation Results for TSM, Medium Investment BRT, and Medium Investment LRT

Variable		TSM	MI BRT	MI LRT
Cost (USD Millions)	Average	82.0	579.8	1,220.2
	St. dev	24.6	220.3	463.6
Ridership (Passengers per Day)	Average	16,898	51,771	59,312
	St. dev	8,411	14,218	15,113
Cost Effectiveness (USD per Hour of User Benefit)	Average	n.a.	15.9	24.2
	St. dev	n.a.	9.8	7.6

n.a. = not available

Next, as figures 1 and 2 below indicate, in Scenario 1 (the AA/DEIS forecasts are accurate):

- There is significant likelihood of the costs exceeding \$1 billion for HI BRT (65 percent) and all LRT alternatives (83 to 98 percent); see Figure 1.
- The likelihood of costs exceeding \$1.5 billion is 11 percent for MI LRT and 67 percent for HI LRT; see Figure 1.
- The likelihood of demand exceeding 32,000 passengers per day is high (75 percent for LI BRT through 98 percent for HI LRT); see Figure 2.
- The likelihood of exceeding 64,000 passengers per day is low for BRT options (3 to 36 percent) and moderate for LRT options (38 to 59 percent); see Figure 2.

Figure 1. Cost Forecasts Probability Ranges – Scenario 1: AA/DEIS Forecasts are Accurate

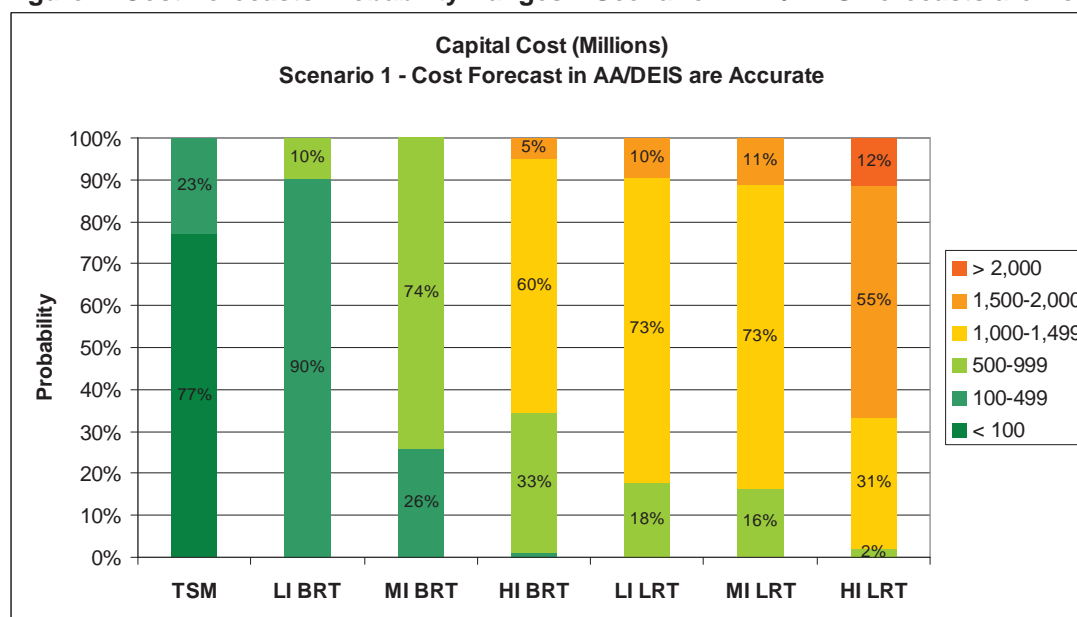
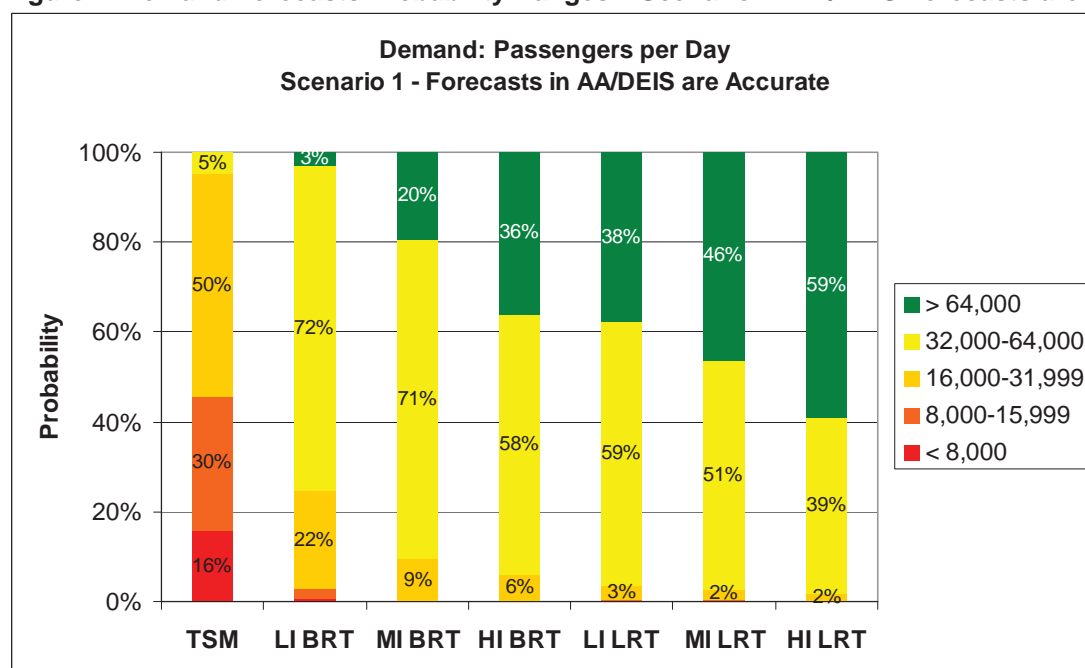


Figure 2. Demand Forecasts Probability Ranges – Scenario 1: AA/DEIS Forecasts are Accurate



Next, figures 3 and 4 below show that in Scenario 2 (the AA/DEIS forecasts are optimistic):

- The likelihood of costs exceeding \$1 billion increases with respect to Scenario 1 for HI BRT (95 percent) and all LRT alternatives (99 to 100 percent); see Figure 3.
- For MI LRT the likelihood of costs exceeding \$1.5 billion is 79 percent, while for HI LRT the likelihood of costs exceeding \$2 billion is 80 percent; see Figure 3.
- The likelihood of demand exceeding 32,000 passengers per day is low for the LI BRT (23 percent) and moderate for the other alternatives (from 47 percent for MI BRT to 71 percent for HI BRT); see Figure 4.
- The likelihood of demand exceeding 64,000 passengers per day is negligible for LI and MI BRT and very low for HI BRT and all the LRT options (2 to 7 percent); see Figure 4.

Figure 3. Costs Forecasts Probability Ranges – Scenario 2: AA/DEIS Forecasts are Optimistic

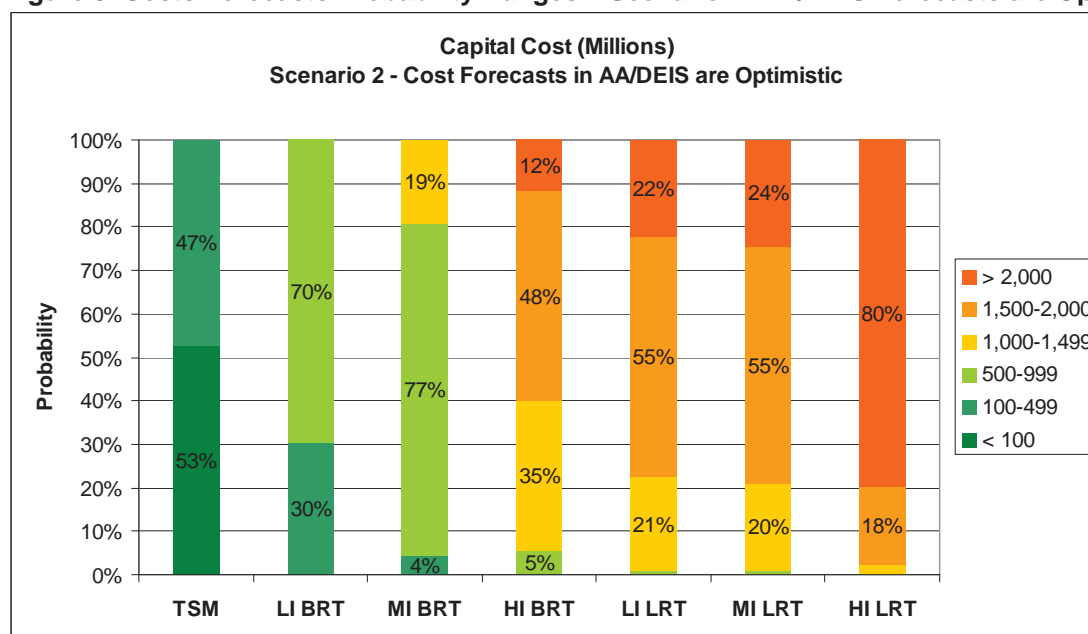
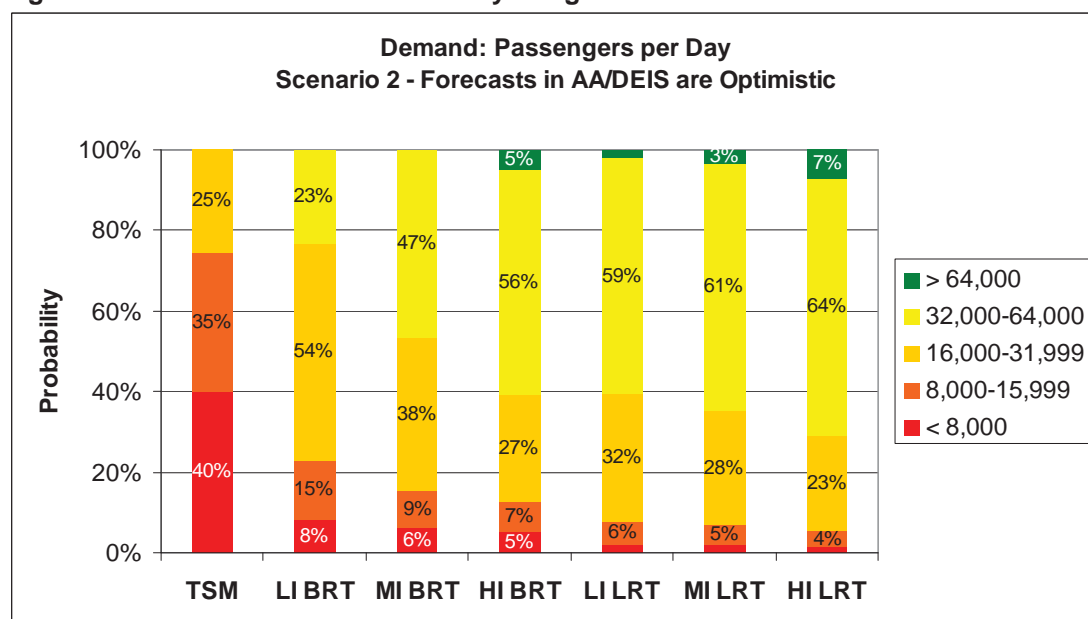


Figure 4. Demand Forecasts Probability Ranges – Scenario 2: AA/DEIS Forecasts are Optimistic



Finally, regarding cost-effectiveness (cost per hour of user benefit) our results indicate the following (see figures 5 and 6, below):

- The most robust alternative across the scenarios we modeled is Medium Investment BRT. Under Scenario 1 (accurate forecasts; see Figure 5), it has an 82 percent probability of being below \$24 per hour of user benefit (FTA medium level) and a 56 percent probability of being below \$15 per hour of user benefit (FTA medium-high level). Under

Scenario 2 (optimistic forecasts; see Figure 6), MI BRT has a 24 percent probability of being below \$24 per hour of user benefit.

- The most robust LRT alternative is Medium Investment LRT. Under Scenario 1 (see Figure 5), it has a 58 percent probability of being below \$24 per hour of user benefit and a 10 percent probability of being below \$15 per hour of user benefit. Under Scenario 2 (see Figure 6), the probability of getting a medium FTA rating is only 0.6 percent.

Figure 5. Probability of Meeting FTA Cost-Effectiveness Assuming Accurate AA/DEIS Forecast

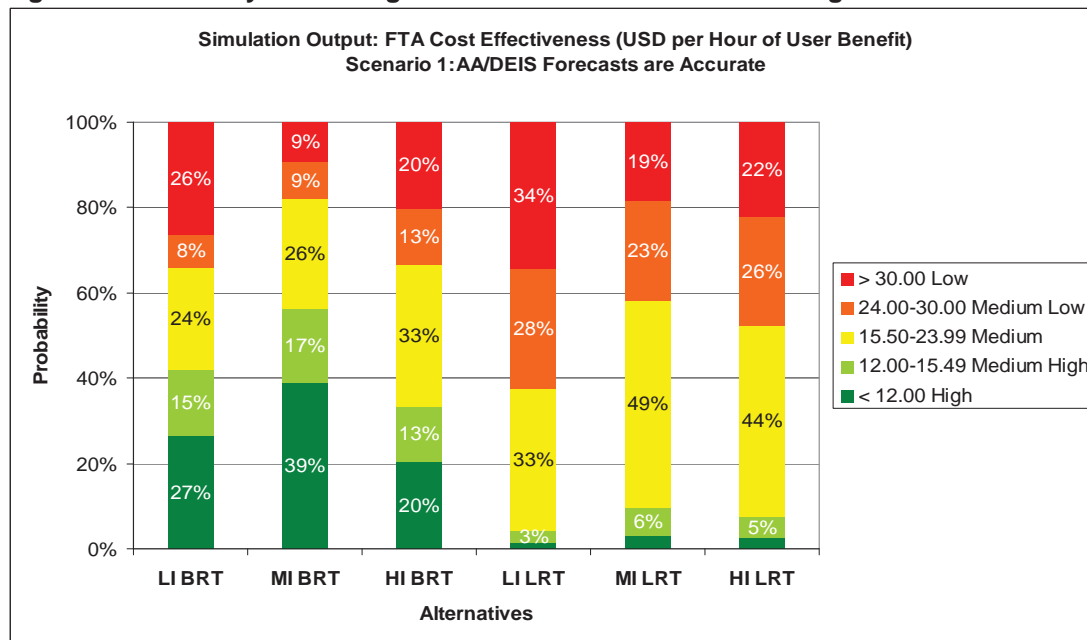
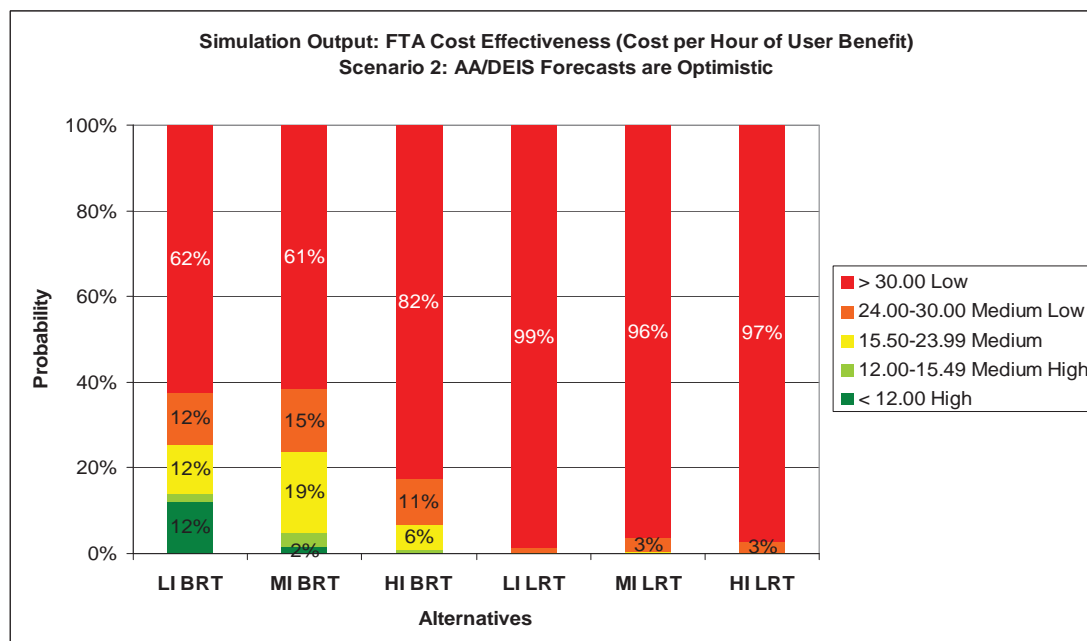


Figure 6. Probability of Meeting FTA Cost-Effectiveness Standards Assuming Optimistic AA/DEIS Forecast



Sensitivity Analysis: Recommendations and Next Steps

WRI recommends combining this sensitivity analysis with other inputs to the decision-making process. Regarding cost-effectiveness, our analysis confirms that the most robust alternative is Medium Investment BRT. High Investment BRT and all the LRT alternatives carry very high risks: it seems likely that the expected cost-effectiveness of each will not be realized. Such risks can lead to a lower probability of receiving state and federal funding and undesired delays in project implementation.

Through our participation in the Purple Line process, we recognize that BRT is not considered as attractive an alternative as LRT in terms of political viability. This may be the result of scarce or misleading information on the potential quality and performance of BRT.⁸ To improve this situation, we suggest that decision makers and other stakeholders seek additional information on the quality of service and impacts associated with existing BRT projects in North America, such as the EmX Line in Eugene, Oregon (see Appendix A); the Los Angeles Orange Line; the Cleveland Healthline on Euclid Avenue; and the Select Bus Service System in New York City.

As design can be improved in the next phases of the project, selecting BRT would open the opportunity for operational designs that do not necessarily require passenger transfers among local and BRT buses. Buses operating on the local highway network might also be able to use the BRT facilities, thus saving time, as is the case with Ottawa's Transitway. Selecting LRT would preclude the use of such flexible operations.

⁸ For additional information, see FTA's *Characteristics of BRT for Decision Makers*, available online at <http://trb.org/news/blurbs/detail.asp?id=4213>

WRI Greenhouse Gas Analysis of the Purple Line AA/DEIS

Summary

WRI's greenhouse gas (GHG) assessment of the various Purple Line options shows that, relative to the No Build scenario, the High Investment BRT alternative provides the greatest emission reductions, followed by Medium Investment BRT. Meanwhile, the TSM alternative results in the greatest emission increases, followed by the LRT options. WRI recommends combining this information with other considerations when selecting the preferred alternative for the Purple Line. In addition, we provide a list of recommendations on how to improve the current GHG assessment.

Background

WRI considers reducing greenhouse gas emissions from the transportation sector of utmost importance since this sector is a major and one of the fastest growing contributors to dangerous climate change. In the United States, transportation contributed approximately 31 percent of energy-related CO₂ emissions in 2005, second only to the power sector's contribution of approximately 47 percent (WRI, 2008).

Improving the efficiency of end-use activities (e.g., motorized road transportation and encouraging shifts to less fuel-intensive transportation modes) is paramount to reducing emissions from liquid fuels, consumption of natural resources, and dependence on volatile international energy markets. The impact on GHG emissions of mass transit solutions that draw their power from the grid, such as the proposed light rail transit options, depends on the fuel source used to produce the electricity.

For these reasons, WRI believes that transportation projects seeking government approval should include GHG emissions forecasts for all proposed alternatives, and that this criterion be included in the decision-making process. In addition, procedures should be put in place to monitor emission levels once the project has been implemented in order to verify if the forecasts were accurate. Finally, efforts should be made to promote more efficient and less polluting transportation modes and to significantly increase the share of renewable energy that powers the electricity grid.

Methodology

WRI reviewed the AA/DEIS greenhouse gas assessment provided in the Air Quality Technical Report, as well as the Traffic Demand and Energy Technical Reports. To complement these studies, we performed a number of calculations to better understand the methods used and the origin of the numbers presented.

With the aim of recommending how the GHG assessment could be strengthened, we provide the following feedback, covering:

- 1) Assumptions made and disclosed in the AA/DEIS.
- 2) Methodologies and key principles to observe when estimating emissions from transportation projects. (See Appendix C for a discussion on recommended methodologies for comparing transportation alternatives.)

A limitation of our analysis, and possibly the AA/DEIS itself, stems from the uncertainty associated with variables that affect many parameters in the study, such as:

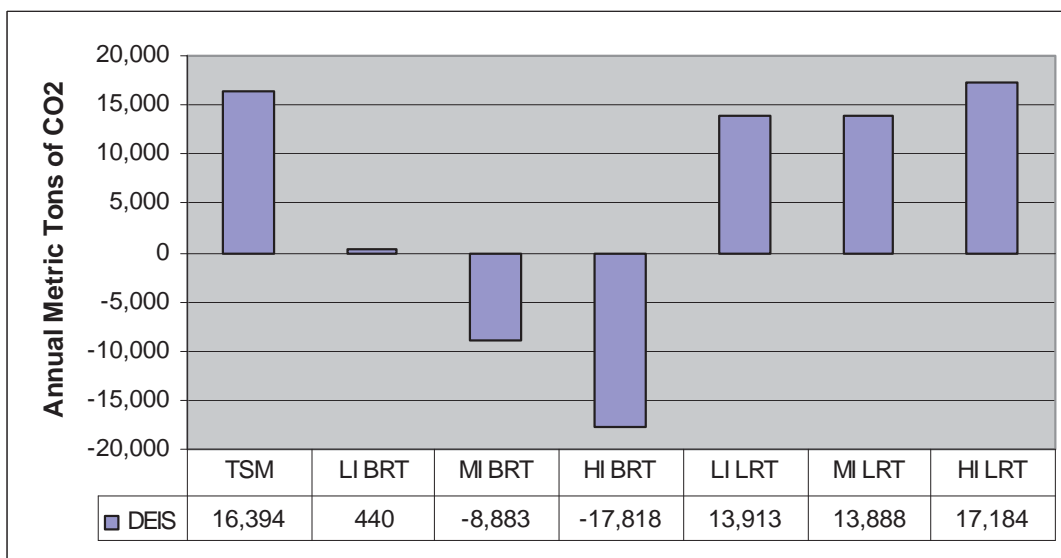
- the price of fuel;
- turnover in vehicle stock and effects on fleet-wide fuel economy from revised Corporate Average Fuel Economy (CAFE) standards;
- population and demographic projections; and
- the impact of likely GHG emissions control legislation on the price and emission levels of each alternative.

Results

In the AA/DEIS, the impact of Purple Line transportation alternatives on CO₂ emissions is presented in terms of daily metric tons of CO₂, with no estimate of uncertainty levels or provision of sensitivity analysis. The results are also presented in terms of percentage change from the No Build scenario and, as explained in the Traffic Analysis Technical Report, these estimates include vehicle miles traveled on roadways for the entire Washington DC Metropolitan Area. It could be expected that changes in emissions caused by a 16-mile local transit project would be small when compared to emissions from vehicles in the whole region.

To provide a better appreciation of the extent of emissions impact from the transportation alternatives, WRI therefore presents the results in terms of absolute annual metric tons, as illustrated in Figure 7. The values presented include emissions from mass transit and impact of modal shift (meaning the number of people who shift their mode of transportation from private vehicle to mass transit or vice versa). For comparison, the information could also be presented in terms of the equivalent number of passenger vehicles taken off the road. In the case of High Investment BRT, that number would be 3,260 based on average annual vehicle emissions of 5.46 metric tons CO₂-equivalent, according to the U.S. EPA (2008c).

Figure 7. Comparison of Purple Line Impact on Annual CO₂ Emissions for 2030, Against the No Build Scenario



(Source: Purple Line AA/DEIS, 2008)

As illustrated in Figure 7, only the Medium and High Investment BRT alternatives reduce CO₂ emissions, with 8,883 and 17,818 fewer metric tons per year, respectively, compared to the No Build scenario. All of the remaining alternatives increase annual emission levels compared to No Build. Energy consumption from roadways decreases with introduction of LRT, but the resulting emissions reduction is not sufficient to counterbalance the effect caused by the high electricity CO₂ emission factor. While we anticipate that this emission factor will decrease in the future due to increased use of renewable energy sources and likely GHG reduction legislation, these drivers have not been included in the AA/DEIS. Further consideration is given to the electricity emission factor in the following sections.

The difference of impacts on emissions levels, when presented in absolute terms, can be considered small when compared to regional, national, and global emission levels. However, the variance between transportation alternatives—approximately 35,000 metric tons per year and equivalent to the annual emissions of over 6,400 passenger vehicles (US EPA 2008c) when comparing High Investment BRT with High Investment LRT—should not be dismissed. In fact, the only way to meet anticipated national GHG emissions targets needed to stabilize climate system will be in making numerous emissions reduction interventions, large and small, across the U.S. economy.

Exploration of AA/DEIS Assumptions

In our analysis, we explore a selection of parameters used in the AA/DEIS estimation of CO₂ with the goal of providing additional information of value for decision making. The parameters selected were based on the assumptions available in the AA/DEIS:

- electricity emission factors;
- mass transit vehicle occupancy rates; and
- alternative fuel and bus vehicle technologies.

Some assumptions used in the AA/DEIS were not disclosed and therefore could not be evaluated.

Electricity emission factors. The choice of electricity emission factors used in the Purple Line analysis affects the net emissions anticipated from the LRT options because the LRT system would be powered by the electricity grid. Electricity emission factors vary significantly depending on the mix of energy feedstocks and their respective carbon intensity; for example, hydropower has a relatively low carbon intensity compared to coal.

While the AA/DEIS used a Maryland state-based emission factor in performing these calculations, WRI proposes using a sub-regional emission factor instead, such as those found in the U.S. EPA's Emissions & Generation Resource Integrated Database (eGRID), to more accurately capture the true emissions intensity of the power plant coverage area providing electricity to the Purple Line LRT (US EPA 2008b). This would be consistent with existing best practices such as those used by the California Climate Action Registry, the Climate Registry, and EPA's Climate Leaders, all of which build off the WRI/WBCSD Greenhouse Gas Protocol's *Corporate Accounting and Reporting Standard, 2nd Edition* (US EPA 2008a, US EPA 2008b, WRI/WBCSD 2005, Climate Registry 2008).⁹ The United Nations Framework Convention on Climate Change (UNFCCC) also recommends using regional grid data for large countries where this information is available.

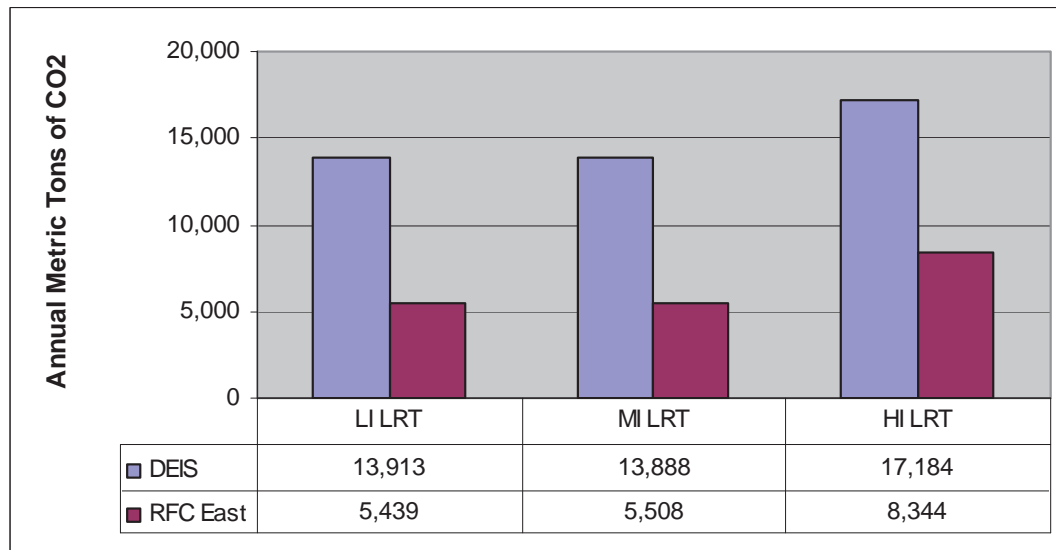
We used EPA's eGRID documentation and its Power Profiler website to identify the appropriate emission factor. Based on the ZIP codes for all Purple Line areas from Bethesda to New Carrollton, the project area falls entirely in the RFC East sub-region which encompasses portions of Maryland, Pennsylvania, Delaware, and New Jersey. This area's electricity generation and service is overseen by the ReliabilityFirst Corporation (RFC).

Several aspects of the grid emission factor merit further analysis, as this number bears great influence on the net GHG emissions caused by electricity-driven LRT options. This can in turn affect the favorability of LRT options in comparison to other alternatives. While the AA/DEIS's projections indicate that all three LRT alternatives would result in a net emissions increase compared to No Build, we believe this increase is likely smaller than forecast in Chapter 4 of the AA/DEIS (page 4-48). Quantifying Purple Line emissions using the regional emission factor would result in a 50-60 percent reduction in emissions for LRT options compared to the AA/DEIS forecasts, as shown in Figure 8.¹⁰ WRI believes this emission reduction would still be conservative, as the eGRID-derived factor is a current figure and does not incorporate expected drops in carbon intensity for the power sector.

⁹ By using the Maryland state emission factor, the AA/DEIS implicitly states that the LRT system will draw electricity from the central grid instead of from an off-grid captive power plant which would have a separate emission factor. We maintain this assumption since no indication otherwise is presented.

¹⁰ The AA/DEIS uses a grid emission factor of 401.5 lbs. CO₂/million BTU, which can also be expressed as 1370 lbs. CO₂/MWh, since 1 kWh = 3412 BTU. As the Purple Line project falls under the RFC East region in EPA's eGRID, the appropriate regional emission factor would be 1090.5 lbs. CO₂/MWh, a 20.4 percent decrease. Note that even though the RFC East emission factor is 20.4 percent less than the emission factor used in the AA/DEIS, LRT emissions result in a 50-60 percent reduction from AA/DEIS forecasts when incorporating effects from the modal shift (i.e., reduced private vehicle emissions).

Figure 8. 2030 Annual GHG Emissions with AA/DEIS and RFC East Electricity Emission Factors, Against the No Build Scenario¹¹



(Source for RFC East emission factors: US EPA. Emissions & Generation Resource Integrated Database (eGRID), 2008.)

Several states in eGRID's RFC East sub-region have passed renewable portfolio standards (RPS) requiring that utilities generate a set percentage of electricity from renewable sources by a specified year. In Maryland, this figure is 20 percent of the state's total electricity production with a minimum of 2 percent derived from solar photovoltaics by 2022 (DSIRE 2008). Since we do not know which fuel sources this renewable electricity will displace, or the emission factors for the renewable sources, we cannot be sure about which emission factor to use for 2030. Regardless, the number should be lower than the AA/DEIS's stock value, barring construction of new high-carbon-intensity power generation that would cancel the reductions caused by the introduction of renewable energy sources, and should be reflected in future GHG forecasts.

Mass transit vehicle occupancy rates. The AA/DEIS uses national average values of 8.7 and 22.4 passengers/mile for BRT and LRT systems, respectively. WRI believes that the occupancy rate selected for BRT is an underestimate since the U.S. average for conventional buses includes a mix of buses running in rural and urban settings, not all in BRT-type conditions.

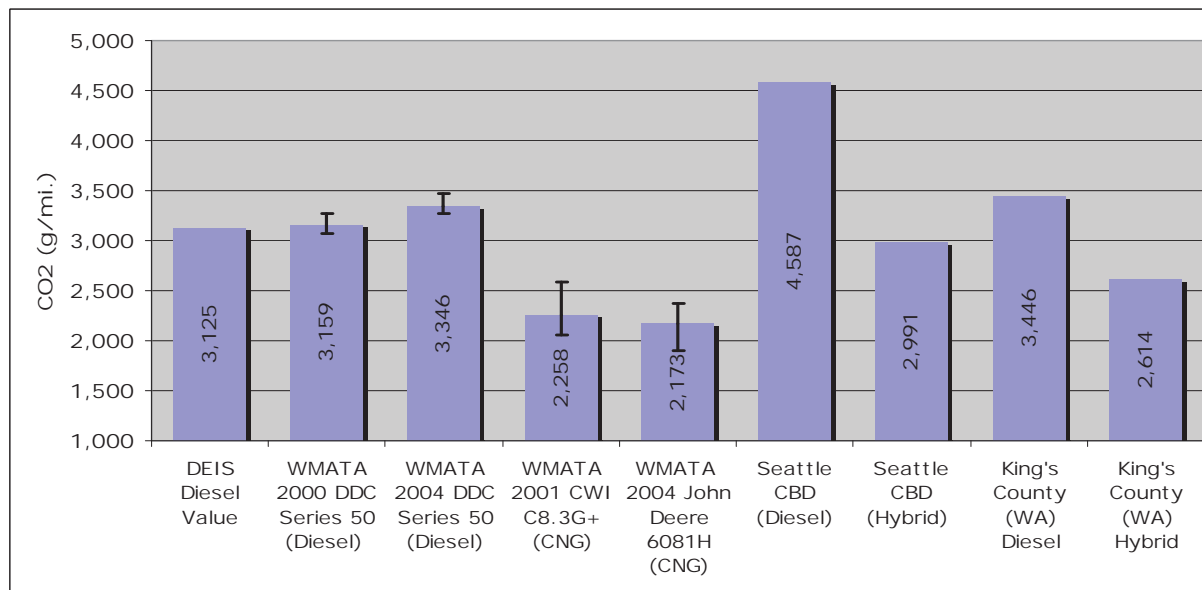
To be fair, there is a lack of reported data available on the average ridership of BRT systems in the United States. However, since systems like the Purple Line BRT options have similar operational specifications to LRT systems, the occupancy rate for the BRT should be much closer to the LRT estimate of 22.4 passengers/mile.

The higher passenger load has an impact on emissions since fewer miles are traveled to transport the same number of passengers, leading to reduced emission levels.

¹¹ The values presented in Figure 8 include the emissions from LRT and the modal shift incurred as a result of implementing LRT. If we were to isolate the emissions from LRT from the modal shift implications, the emissions change that results from using the sub-regional electricity emission factor would be lower, since modal shift causes a reduction in total LRT emissions.

Vehicle propulsion factors. The AA/DEIS uses single propulsion factor values for both BRT and LRT alternatives, which overlooks the range of fuel sources and technology types for either transit mode. Figure 9 depicts a range of propulsion values for potential BRT systems including diesel, compressed natural gas (CNG), and hybrid electric, based on studies developed for the Washington Metropolitan Area Transit Authority (WMATA) and the King County, Washington Metro Transit Authority.

Figure 9. GHG Emission Intensities for Selected Bus Fuel and Vehicle Technology

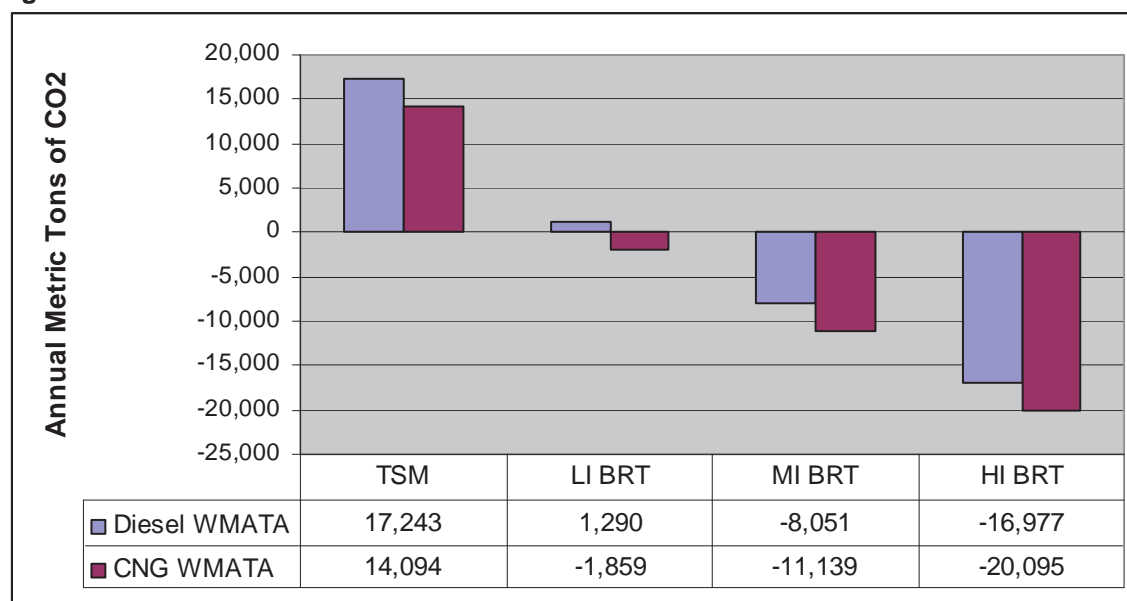


(Source: Melendez et al. 2005, Chandler and Walkowicz 2006.)

The error bars for WMATA vehicles represent the range of values obtained after multiple test runs conducted by the National Renewable Energy Laboratory (NREL) in Washington, DC (Melendez et al. 2005, Chandler and Walkowicz 2006). Figure 9 shows high variability in anticipated GHG emissions contingent upon engine and fuel type and driving cycles. The diesel buses operating in Seattle's Central Business District (CBD) emit over twice the emissions per mile traveled as some CNG bus classes operating in the Washington DC Metro Area, underscoring the significance that propulsion values play in determining net emissions. WRI therefore recommends that, when evaluating the impact of the Purple Line on emissions, bus propulsion values be explored.

For purposes of illustration, Figure 10 presents the impact of replacing diesel with CNG buses for the Purple Line TSM and BRT/LRT alternatives. In the AA/DEIS, all bus options are assumed to be diesel-based. As the figure shows, Medium Investment BRT using CNG technology would reduce CO₂ emissions by 38 percent compared to diesel technology.

Figure 10. Comparison of Annual GHG Emissions in 2030 for Diesel and CNG Bus Technologies, Against the No Build Scenario



(Source for emissions factors: Melendez, et al. 2005. Activity data from AA/DEIS.)

GHG Assessment: Recommendations and Next Steps

- WRI recommends development of a more transparent and complete GHG assessment of the Purple Line alternatives. Key information needs to be centralized in one section of the AA/DEIS, key assumptions need to be disclosed, units need to be corrected throughout the technical reports, and values made consistent among the reports.
- WRI agrees with the AA/DEIS's findings that Medium and High Investment BRT systems will reduce GHG emissions while the TSM and LRT scenarios will increase emission levels. However, the AA/DEIS does not disclose all assumptions and may ignore several exogenous factors that influence the level of ridership and consequent emissions. To overcome this problem, emission levels could be presented in ranges or uncertainty levels disclosed.
- Conducting a sensitivity analysis would prove which variables are most influential in determining the final GHG emissions results. Thus, variables such as the BRT's fuel consumption or propulsion factor should be tested for each of the configurations potentially composing the Purple Line BRT fleet (e.g., CNG, diesel, hybrid). Our results show that depending on the propulsion value selected net emissions may vary by 20+ percent.
- WRI suggests using a sub-regional emission factor for electricity consumption instead of state-based emission factors, as explained earlier.

- We propose using similar vehicle occupancy rates for LRT and BRT since they would be designed to provide similar levels of transportation service. Occupancy rates can be expressed as an average or a range, the latter enabling a better appreciation of the variability that exists between systems.
- Any estimates of percentage change in emissions due to the Purple Line can be misleading as in Table 4.7-5, by making relative comparisons to the Washington DC Metro Area's aggregate emissions. Instead, these numbers should be judged in absolute terms, or at a minimum compared to total CO₂ emissions burdens for only the Purple Line region, and not the entire DC area.
- Future analyses should incorporate variable uncertainty into their forecasting models, since point estimates provide no insight into the range of possible values these quantities may assume. Where information is unavailable regarding standard deviations and probability distributions, a qualitative treatment and estimated value ranges should be provided and justified. By including substantiated minimum and maximum values (for quantities such as annual GHG emissions or total daily boardings) in policy analyses, policymakers are able to make informed decisions based on improved information that point estimates cannot provide.



Appendix A. LRT and BRT Case Studies: Portland and Eugene, Oregon

In detailing the alternatives under consideration, the AA/DEIS rightly points to examples of other U.S. localities where comparable transit systems have been implemented. It is often instructive to study the experience of other cities, and we welcome this approach. To add to this discussion, we also offer two brief but instructive case studies of successful LRT and BRT systems in Oregon.

Transit Project Experiences and Lessons from Oregon

Oregon has a well-deserved reputation for progressive transportation and land-use planning. For 35 years the state has planned around established urban growth boundaries that encourage efficient land use and protect natural areas as well as air and water resources. Several Oregon cities are often cited as the gold standard in implementing sustainable transportation strategies through mixed-use, transit-oriented development. A brief look at two such examples can provide lessons for Maryland's proposed Purple Line system.

Portland's Metropolitan Area Express (MAX)

Key Statistics (all lines combined)

Construction Costs: \$1.65 billion

Length: 44 miles

Stations: 64

Daily Ridership: ~100,000 trips

Annual Ridership (FY07): 34 million trips



Portland's MAX light rail system (photo by Andrew Collins)

Portland installed the first of four segments of the MAX light rail system in 1986 with funds reallocated from capital originally marked for highway development. Subsequent segments were constructed in 1998, 2001, and 2004. Today the MAX ranks among the top five systems nationwide in terms of ridership and is an example of successful, proactive long-term transportation and urban planning.

Overall, ridership has grown some 200 percent between 1997 and 2006 (population increased 11 percent during this period). Investments in additions and extensions have been driven by the following:

- Billions of dollars in savings through avoided infrastructure costs including urban freeways, neighborhood disruptions, and increased air pollution
- Dedicated right-of-way within the existing road system, crossing local streets at grade in coordination with the roadway signal system
- Success in facilitating compact, mixed-use development around stations
- Riders' familiarity with the MAX system
- A defined transit role within a balanced transport system that includes roads, freeways, bike routes, sidewalks, and other modes of transport

A fundamental reason for transit success in Portland has been an effective long-term vision that guides near-term implementation strategies. The region has an overall planning horizon that reaches out to 2040. The city also has a Metro Regional Transportation Plan that sets 20-year development strategy for the transportation system—a long-term perspective providing critical direction for near-term transit system implementation plans. This integrated, long-term approach allows the region to prepare for future challenges and develop appropriate transportation options to meet demands.

Eugene-Springfield Emerald Express (EmX)

Key Statistics (all lines combined)

Construction Costs: \$24 million

Length: 4 miles (+7.8 miles in 2010)

Stations: 10

Daily Ridership: 8,000 - 10,000 trips

Annual Ridership (FY07): 1.4 million trips



Eugene's EmX BRT system (photo courtesy of Eugene Lane Transit District)



In contrast to Portland's MAX system, the EmX in Eugene, Oregon is a smaller transit system based on a bus rapid transit (BRT) model. The EmX Green Line, which opened in 2007, provides a commuter connection between Eugene and Springfield—a metro area of approximately 330,000 residents expecting significant population growth over the next several decades.

The region weighed several transit alternatives as part of the planning process. Considering financial resources and the current population density of the areas, planners decided on a BRT system as the best option and noted it would not preclude light rail options for the corridor in the future. Planners also considered traditional bus service, but deemed this inappropriate due to projected congestion in the corridor that would delay bus travel and diminish public appeal.

Ridership has thus far exceeded projections due to high fuel costs and positive community reactions to the BRT's appearance and convenience. Elevated platforms, art, landscaping, and the sleek design of the hybrid buses have all contributed to general public popularity. Signal priorities and exclusive right-of-ways (60 percent of the corridor) enable accelerated service. The city is pursuing plans for additional EmX corridors in 2010 and 2015.

Appendix B. Assumptions for Sensitivity Analysis

Table B1. Inputs to Monte Carlo Simulation

	Forecast is Accurate		Forecast is Optimistic	
	Capital Cost (USD)	Demand (passengers/day)	Capital Cost	Demand
TSM	81,960,000 (s.d. 30%)	16,900 (s.d. 52.4%)	+20% (s.d. 30%)	-39.5% (s.d. 52.4%)
LI BRT	386,390,000 (s.d. 38%)	40,000 (s.d. 52.4%)	+45% (s.d. 38%)	
MI BRT	579,820,000 (s.d. 38%)	51,800 (s.d. 52.4%)		
HI BRT	1,088,480,000 (s.d. 38%)	58,900 (s.d. 52.4%)		
LI LRT	1,206,150,000 (s.d. 38%)	59,300 (s.d. 52.4%)		
MI LRT	1,220,150,000 (s.d. 38%)	62,600 (s.d. 52.4%)		
HI LRT	1,634,840,000 (s.d. 38%)	68,100 (s.d. 52.4%)		

Note: Probability distributions are assumed normal with Mean and Standard Deviation according to the table. Simulation assumes that the probability distributions are not independent. Correlation is 50% between BRT and TSM, and 50% between LRT and BRT. Source of variations: B. Flyvbjerg, M.K. Skamris Holm, S.L. Buhl.

Appendix C. Methodology for Comparing GHG Emissions of Transportation Alternatives (Based on Cordeiro M., Schipper L. et al, 2008)

In the United States there are currently no officially approved methodologies to evaluate the impact of transportation projects on GHG emissions. WRI encourages developing standard methodologies for estimating emissions from transportation projects, upgrading transportation models to provide activity forecasts with lower uncertainty levels, and integrating land use, transportation, and emissions models. We recognize that emission forecasts are not devoid of uncertainty and the methods available still need improvement to offer more complete assessments. WRI recommends that project developers describe the methodologies used and clearly present the assumptions made in the analysis, so that reviewers and policymakers can understand the limitations of the assessment and make informed decisions.

Methodologies tend to be project-specific due to the nature of local transport interventions. To estimate the impact of proposed transit projects on emissions, we first need to define the assessment boundary based on the area within which the project has a significant impact on emissions. It should not be forgotten that a transport intervention has primary effects (intended changes on the transportation system) and secondary effects (unintended changes caused by the project activity). The secondary effects can cause one-time impacts such as emissions from construction and decommissioning of project activities, and may happen upstream (e.g., where vehicles and fuels are produced) or downstream of the project (e.g., changes in traffic or travel outside the project boundary). The impacts on non-project vehicles and people can be difficult and expensive to calculate. Although one may decide to ignore these effects, experience in some cities indicates that their impacts on emissions can be significant and cause an increase or decrease in overall emissions.

For the benefit of completeness and transparency, the methods and assumptions used to define the GHG assessment boundary and the impacts upstream and downstream of the project should be explicitly disclosed. A rough estimate of upstream and downstream impacts can help assess their magnitude and significance before big investments in measurements are made. Where a project's impact is considered negligible or within the margin of error of the overall emissions reductions estimate, this impact can be dismissed or a conservative assumption of its magnitude should be made.

In broad terms, the framework to estimate CO₂ emissions from transportation projects should include seven main steps: (1) land-use forecasting, (2) travel demand forecasting, (3) transportation systems operations analysis, (4) modal and vehicle activity analysis, (5) fuel and emission factors analysis, (6) fleet and vehicle characteristics analysis, and (7) emissions estimation. Land-use forecasting determines the changes in population and demography in the area of interest and spatially allocates people, households, and commercial activities. Travel demand forecasting estimates the level of travel, given the spatial outputs from a land-use model. Transportation systems operations analysis predicts the travel times, speeds, delays, and modal activity. The entire set of components forms a comprehensive procedure for analyzing the emission impacts of transport interventions. Additionally, there may be feedback between this systems operations analysis and previous components. For example, predicted travel times may influence land-use and travel demand, which in turn will affect systems operations. Given

vehicle modal activity data, emissions can be predicted, possibly with information from technology/fleet and vehicle efficiency analysis.

There has been a call for integrating land-use and transportation models used in the metropolitan planning process, based on the recognition that land use influences transportation outcomes and that transportation investments influence land-use decisions. This integration has been accomplished at the aggregate level, but there is a need to better understand the behavioral linkages between daily household activity and travel patterns on the one hand, and long-term choices of housing and job location and vehicle ownership on the other, to provide a robust behavioral foundation for model development that incorporates these factors (University of Washington et al., 2001).

Two main elements form the interface between emissions and traffic simulations or models: the vehicle fleet distribution (vehicle type in terms of transport mode and emission characteristics) affected by the transport measure, and the emission and traffic simulation model (dis)aggregation levels. This (dis)aggregation refers to the size of spatial, temporal, and demographic categories used in the models, enabling them to more or less realistically represent transportation user behavior and emission rates.

Finally, it should be noted that many good models robustly interpret the real world and allow the effects of different scenarios to be compared, albeit under modeled and not real-world conditions. However, few models precisely capture reality within a known uncertainty band. The differences between reality and the modeling environment are due in part to uncertainties in the model's design, uncertainty in the base data and parameters (e.g., emission factors by class and age of vehicle, driver aggressiveness distribution, etc.), and uncertainties in the model's calibration (origin-destination surveys, on-road fuel consumption measurements, etc.). Uncertainty levels can be improved by using the same method and models to estimate emissions from project alternatives.

Appendix D: Additional Observations Regarding AA/DEIS Reports

- *Energy Technical Report*
 - It is unclear why the creation of a Purple Line system would affect the number of heavy trucks, positively or negatively, as indicated in Table 2-1. A justification of this would be informative.
 - Though energy intensity values for cars and light trucks are taken from the DOE's Transportation Energy Data Book, it is not clear why a 1.2 passengers/vehicle value was used in the AA/DEIS when DOE indicates an average value of 1.57.
- No explanation is offered for the inconsistent values found in different sections of the AA/DEIS. For example, in Chapter 4 the VMT and daily direct energy demand numbers differ between Table 4.15-1 and Tables 4.7-4 and 4.7-5.

Appendix E. Further Reading on GHG Emissions Assessments

- American Public Transportation Authority. *2008 Public Transportation Fact Book*. 59th Ed. June 2008.
- California Climate Action Registry. (<http://www.climateregistry.org/>) 2008.
- Chandler, K. and K. Walcovicz. *King County Metro Transit Hybrid Articulated Buses: Final Evaluation Results*. Technical Report NREL/TP-540-40585. December 2006.
- Climate Registry. (<http://www.theclimateregistry.org/>). 2008.
- Cordeiro, M. and Schipper L. et al. *Measuring the Invisible: Quantifying Emission Reductions from Transportation Solutions – Publication Series*. 2008.
- DSIRE. Database of State Incentives for Renewables & Efficiency. (Online: http://www.dsireusa.org/library/includes/incentive2.cfm?Incentive_Code=MD05R&state=MD&CurrentPageID=1&RE=1&EE=1) Accessed: Dec 3 2008.
- Energy Information Agency. *International Energy Outlook 2008*. (<http://www.eia.doe.gov/oiaf/ieo/>)
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- Sun, Lena H. “As Gas Prices Fall, Transit Still Popular.” *Washington Post*, page B01. Dec 2 2008.
- UNFCCC. *Methodological Tool: Tool to calculate the emission factor for an electricity system*. Version 1.1. E5 39 Report Annex 12. 2008.
- US DOT, Transit Bus Life Cycle Cost and Year 2007 Emissions Estimation – Final Report; July 2, 2007 (Online: http://www.fta.dot.gov/documents/WVU_FTA_LCC_Final_Report_07-23-2007.pdf).
- US EPA. Climate Leaders Program. (<http://www.epa.gov/climateleaders/>). 2008a.
- US EPA. *Emissions & Generation Resource Integrated Database (eGRID)*. 2008b. (<http://www.epa.gov/cleanenergy/energy-resources/egrid/index.html>)
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- WRI. *Climate Analysis Indicators Tool*. 2008. (<http://cait.wri.org/>)
- WRI/WBCSD. *The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard*: Revised Edition. 2005.

Appendix F. List of Authors, Reviewers, and Project Support Staff for WRI's Purple Line Analysis

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Submission Content/Notes : Good afternoon. My name is Greg Fuhs, G-R-E-G, F-U-H-S. I represent the World Resources Institute, an independent, non-partisan environmental think tank based in Washington, DC.

Our staff of 160 works on a wide range of environment and sustainable development issues worldwide providing peer review research and analysis to find practical solutions to some of our most pressing problems.

We have joined the purple line discussion to share our significant experience analyzing and implementing sustainable transit solutions around the globe.

Also as a local organization with many staff living near the proposed route, we have a direct stake in seeing the best possible alternative selected.

In recent months, WRI has consulted with a diverse group of stakeholders on this issue and we are assessing key elements of the DEIS with a commitment to objectivity and analytical rigor.

We will soon submit detailed written comments, but today we wanted to provide some initial thoughts.

First through our initial analysis we have concluded that a robust purple line should be built as soon as possible to achieve the stated project purpose.

We find that the no build and TSM alternatives are not viable because they fail to adequately address long-term congestion and related issues.

While the purple line is no panacea, without it the region will be forced to take even more costly and disruptive actions in the future to address expected growth and resulting traffic and related problems.

Second, we believe that either a well designed BRT or LRT could if done right improve mobility, support economic development and reduce the environmental impacts of transportation in this area.

There are legitimate concerns about building a transit line along the proposed routes and each alternative as currently proposed has its drawbacks.

However, the consequences of delaying or abandoning this project would be far greater.

Third, we note that key factors to weigh in any transit investment include local needs and preferences, political and financial feasibility, cost effectiveness and balancing of economic and environmental considerations.

While the DEIS touches on all these areas, we do see some gaps where additional analysis and/or clear presentation of data can shed important light on the alternatives.

Our forthcoming written submission will focus on assessing the risks, cost effectiveness and greenhouse gas emissions profiles of the various alternatives.

We will also provide a sensitivity analysis of cost and ridership projections with an eye toward incorporating assessments of uncertainty into the decision making process.

Ultimately, as I said, there are pros and cons to each alternative and the final selection may call for significant revisions.

After the selection process, we urge MTA to continue consulting with the public on system design and placement and on approaches to mitigating negative impacts.

We look forward to engaging further on the purple line project and hope to see its early implementation. Thank you for the opportunity to provide input.